

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JAMES F. DINWIDDIE, JR.,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION
)	NO.: 1:10-cv-03516-RLV-ECS
)	
LEXISNEXIS RISK SOLUTIONS)	
INC.,)	
Defendant.)	

DEFENDANT’S STATEMENT OF
UNDISPUTED MATERIAL FACTS

In support of its motion for summary judgment, Defendant LexisNexis Risk Solutions Inc. (“LexisNexis”) respectfully submits the following statement of material facts to which LexisNexis contends there is no genuine issue to be tried:

1. LexisNexis is a “consumer reporting agency” (as defined in the Fair Credit Reporting Act (“FCRA”)) that collects, maintains, and uses information – including auto and property insurance claims histories – to create “consumer reports” (as also defined in the FCRA) for its various customers that have a permissible purpose for accessing the information. *See* Affidavit of Jelani Headley (“Headley Aff.”) ¶ 3. A copy of Headley Aff. is attached hereto as Exhibit A.

2. In addition to creating consumer reports from the information in its own databases or files, LexisNexis frequently acts as a “reseller” (as defined in the FCRA), providing its customers with access to consumer information that LexisNexis obtains from other consumer reporting agencies and then reformats, but which LexisNexis does not maintain in its own databases. *See id.* ¶ 4.

3. In particular, LexisNexis obtains “credit” (as defined in the FCRA) information from other consumer reporting agencies because LexisNexis does not maintain a database of such information itself. *See id.* ¶ 5.

4. LexisNexis does not maintain a credit file on Plaintiff James F. Dinwiddie, Jr. *See id.* ¶ 6.

5. LexisNexis provides consumer reports to a number of customers, including insurance companies; however, LexisNexis is not involved in decisions made by insurance companies or other customers based on the reports, and LexisNexis typically is not provided information regarding those decisions. *See id.* ¶ 7.

6. Sometime before July 14, 2010, Plaintiff applied to purchase a surety bond from Travelers Insurance Company (“Travelers”). *See Letter*

from Surety Consultants, Inc. to Plaintiff James F. Dinwiddie Jr. dated Aug. 16, 2010 (produced by Plaintiff in discovery) (copy attached to Affidavit of Bret Hobson (“Hobson Aff.”) as Exhibit 1).¹ A copy of Hobson Aff. is attached hereto as Exhibit B.

7. On July 14, 2010, LexisNexis received a request from Travelers for a consumer report on Plaintiff. *See* Headley Aff. ¶ 8.

8. LexisNexis responded to Travelers’ request by obtaining credit information on Plaintiff from Experian and reselling that information to Travelers, and, other than the information LexisNexis resold from Experian, LexisNexis provided no additional report to Travelers. *See id.* ¶ 9.

9. For its own undisclosed reasons, Travelers chose to deny Plaintiff’s application and refused to sell him a bond. *See* Hobson Aff. Ex. 1.

10. Travelers’ agent informed Plaintiff that his application had been denied “[b]ased at least partially upon information found in a consumer

¹ Although this letter denying Plaintiff’s request for a surety bond is dated August 16, 2010, the chain of correspondence between Plaintiff and LexisNexis that the denial letter set off began at least as early as July 20, 2010, suggesting that the letter was either misdated or sent after Plaintiff was actually informed of the denial. In any event, the precise dates of the application and denial are immaterial to any issue in this case and are provided only for narrative purposes.

credit report provided by [LexisNexis].”² *See id.*

11. Plaintiff thereafter telephoned LexisNexis and requested a copy of the report that LexisNexis had provided to Travelers. *See* Headley Aff. ¶ 10.

12. LexisNexis responded to Plaintiff’s request by letter on July 20, 2010, explaining that because LexisNexis was merely a “reseller” of the credit report, “[t]he credit bureau that provided your information to us will be mailing the requested report to you directly.” *See id.* ¶ 11; *id.* Ex. 1.

13. That same day, LexisNexis ordered the report from Experian (the credit bureau that had provided the credit information on Plaintiff to LexisNexis), and Experian sent a copy to Plaintiff shortly thereafter. *See id.* ¶ 12; *id.* Ex. 2.

14. After reviewing the credit report he received from Experian, Plaintiff sent a letter to LexisNexis on July 29, 2010,³ again requesting a copy of the credit report that LexisNexis had provided to Travelers. *See id.* ¶ 13; *id.* Ex. 3.

² The letter stated that the report was provided by “Choicepoint Services Inc.,” which was Defendant LexisNexis Risk Solutions Inc.’s name prior to January 1, 2010.

³ The LexisNexis Consumer Center did not receive this letter until on or about August 25, 2010. *See id.* ¶ 13; *id.* Ex. 3.

15. In his July 29 letter, Plaintiff stated that he did not want Experian's report, which he had already received, but instead he wanted the separate file that he believed LexisNexis had provided to Travelers. *See id.* ¶ 13; *id.* Ex. 3.

16. On September 7, 2010, LexisNexis again responded to Plaintiff by letter, acknowledging its understanding that Plaintiff did not want a report from Experian, but explaining that no separate credit report existed: "[LexisNexis] does not have a credit file on you and therefore we would not be able to send you a credit file. We are able to provide you with the credit file that was obtained from Experian and provided to Travelers." *See id.* ¶ 14; *id.* Ex. 4.

17. LexisNexis's September 7 letter asked Plaintiff to call LexisNexis if he had not received the credit report from Experian. *See id.* ¶ 14; *id.* Ex. 4.

18. LexisNexis's September 7 letter also informed Plaintiff that LexisNexis provides various other consumer reports to businesses at their request, and that Plaintiff was free "to order, view and dispute these reports." *See id.* ¶ 14; *id.* Ex. 4.

19. LexisNexis's September 7 letter then provided Plaintiff with an

Internet address where he could order a copy of all personal information that LexisNexis maintains on him in its files (*i.e.*, a “Full File Disclosure Report”) and reiterated that “[t]his will not include any credit data as we do not store credit data on you.” *See id.* ¶ 14; *id.* Ex. 4.

20. Plaintiff has never ordered a Full File Disclosure Report from LexisNexis. *See id.* ¶ 15.

21. During discovery, Plaintiff served a third-party subpoena on Travelers, requesting “all information on file pertaining to Plaintiff, received from [LexisNexis].” *See* Subpoena from Plaintiff James F. Dinwiddie, Jr. to Travelers Insurance, Inc. (copy attached to Hobson Aff. as Exhibit 4).

22. In response to the subpoena that he served on Travelers, Plaintiff received a single document from Travelers: a two-page copy of Plaintiff’s credit file. *See* Pl.’s Answer to Def.’s First Interrogs. (copy attached to Hobson Aff. as Exhibit 3) ¶ 14 (with attachment).

23. Plaintiff cannot identify any information that LexisNexis provided to Travelers that LexisNexis did not also provide to Plaintiff when, in response to Plaintiff’s request, LexisNexis caused Experian to send him a copy of his credit report. *See* Pl.’s Answers to Def.’s Reqs. for Admis. (copy attached to Hobson Aff. as Exhibit 2) ¶ 5.

24. “Accurint” is not a company; rather, it is merely the brand name of a product offered by an affiliated company of LexisNexis. *See id.* ¶¶ 7, 8.

25. Plaintiff’s sole alleged ground for holding Reed Elsevier Inc. liable in this case is that Reed Elsevier is a parent company of LexisNexis. *See Hobson Aff. Ex. 3* ¶ 6.

26. LexisNexis routinely receives requests from consumers for disclosures of their files, and accordingly, LexisNexis sends each of those consumers a “Full File Disclosure Report,” which contains all the personal information that LexisNexis stores on that consumer, including auto and property insurance claims information, employment information, and tenant information. *See Headley Aff.* ¶ 16.

27. LexisNexis’s Full File Disclosure Reports do not contain consumers’ “credit” files that have been provided to insurance customers because LexisNexis does not maintain credit files in its own databases. *See id.* ¶ 17.

28. If consumers request to see their credit reports that LexisNexis has resold, LexisNexis arranges for the credit bureau from which LexisNexis obtained the credit data to send the consumers their reports directly. *See id.* ¶ 18.

29. LexisNexis was not involved in Travelers' decision to deny Plaintiff's application for a surety bond and was not notified of Travelers' reason for its decision. *See id.* ¶ 19.

This 4th day of May, 2011.

Respectfully submitted,

/s/ Bret R. Hobson

Jill A. Pryor (Ga. Bar No. 589140)

Bret R. Hobson (Ga. Bar No. 882520)

BONDURANT, MIXSON & ELMORE, LLP

1201 West Peachtree St. NW

Suite 3900

Atlanta, Georgia 30309

Tel: (404) 881-4100

Fax: (404) 881-4111

pryor@bmelaw.com

hobson@bmelaw.com

***ATTORNEYS FOR DEFENDANT
LEXISNEXIS RISK SOLUTIONS INC.***

LR 5.1 CERTIFICATE

I hereby certify pursuant to L.R. 7.1(D) that this document was prepared in Times New Roman font, 14-point, in accordance with L.R. 5.1(C).

This 4th day of May, 2011.

/s/ Bret R. Hobson
Bret R. Hobson
Georgia Bar No. 882520

CERTIFICATE OF SERVICE

I do hereby certify that I have this 4th day of May 2011 served a copy of the foregoing **DEFENDANT'S STATEMENT OF UNDISPUTED MATERIAL FACTS**, which has been electronically filed with the Clerk of Court using the CM/ECF system, upon James F. Dinwiddie, Jr., who is proceeding *pro se*, by U.S. mail as follows:

James F. Dinwiddie, Jr.
1838 Marsh Trail Circle
Atlanta, GA 30328

/s/ Bret R. Hobson
Bret R. Hobson
Georgia Bar No. 882520

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JAMES F. DINWIDDIE, JR.,)	
)	
Plaintiff,)	
)	CIVIL ACTION
v.)	NO.: 1:10-cv-03516-RLV-ECS
)	
LEXISNEXIS RISK SOLUTIONS)	
INC.,)	
Defendant.)	

AFFIDAVIT OF JELANI HEADLEY

STATE OF GEORGIA,
COUNTY OF FULTON.

Personally appeared before the undersigned officer, duly authorized to administer oaths, Jelani Headley, being first duly sworn deposed and said:

1. I am over the age of eighteen and otherwise competent to testify to the matters stated below based on my personal knowledge.
2. My name is Jelani Headley, and I am the Consumer Center's Insurance Manager of Operations for Defendant LexisNexis Risk Solutions Inc. ("LexisNexis") and have been since July 2007.
3. LexisNexis is a "consumer reporting agency" (as defined in the Fair Credit Reporting Act ("FCRA")) that collects, maintains, and uses information – including auto and property insurance claims histories – to create "consumer

reports” (as also defined in the FCRA) for its various customers that have a permissible purpose for accessing the information.

4. In addition to creating consumer reports from the information in its own databases or files, LexisNexis frequently acts as a “reseller” (as defined in the FCRA), providing its customers with access to consumer information that LexisNexis obtains from other consumer reporting agencies and then reformats, but which LexisNexis does not maintain in its own databases.

5. In particular, LexisNexis obtains “credit” (as defined in the FCRA) information from other consumer reporting agencies because LexisNexis does not maintain a database of such information itself.

6. LexisNexis does not maintain a credit file on Plaintiff James F. Dinwiddie, Jr.

7. LexisNexis provides consumer reports to a number of customers, including insurance companies; however, LexisNexis is not involved in decisions made by insurance companies or other customers based on the reports, and LexisNexis typically is not provided information regarding those decisions.

8. On July 14, 2010, LexisNexis received a request from Travelers Insurance (“Travelers”) for a consumer report on Plaintiff.

9. LexisNexis responded to Travelers’ request by obtaining credit

information on Plaintiff from Experian and reselling that information to Travelers, and, other than the information LexisNexis resold from Experian, LexisNexis provided no additional report to Travelers.

10. Sometime on or after July 20, 2010, Plaintiff telephoned LexisNexis and requested a copy of the report that LexisNexis had provided to Travelers.

11. LexisNexis responded to Plaintiff's request by letter on July 20, 2010, a true and correct copy of which is attached hereto as Exhibit 1.

12. That same day, LexisNexis ordered the report from Experian (the credit bureau that had provided the credit information on Plaintiff to LexisNexis), and Experian sent a copy to Plaintiff shortly thereafter. A true and correct copy of the credit report which Plaintiff received from Experian is attached hereto as Exhibit 2.

13. On or about August 25, 2010, the LexisNexis Consumer Center received a letter from Plaintiff dated July 29, 2010, again requesting a copy of the credit report that LexisNexis had provided to Travelers. A true and correct copy of the letter is attached hereto as Exhibit 3.

14. On September 7, 2010, LexisNexis again responded to Plaintiff by letter, a true and correct copy of which is attached hereto as Exhibit 4.

15. Although LexisNexis voluntarily provided a Full File Disclosure

Report to Plaintiff during discovery in this case, Plaintiff has never ordered such a report from LexisNexis.

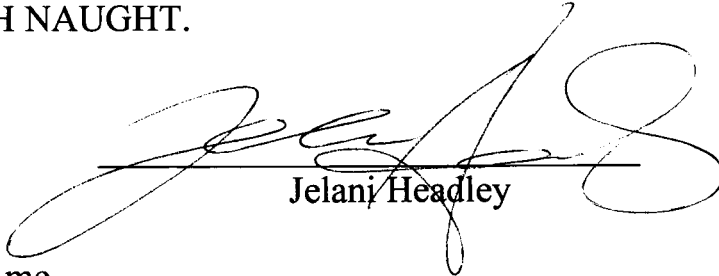
16. LexisNexis routinely receives requests from consumers for disclosures of their files, and accordingly, LexisNexis sends each of those consumers a “Full File Disclosure Report,” which contains all the personal information that LexisNexis stores on that consumer, including auto and property insurance claims information, employment information, and tenant information.

17. LexisNexis’ Full File Disclosure Reports do not contain consumers’ “credit” files that have been provided to insurance customers because LexisNexis does not maintain credit files in its own databases.

18. If consumers request to see their credit reports that LexisNexis has resold, LexisNexis typically arranges for the credit bureau from which LexisNexis obtained the credit data to send the consumers their reports directly.

19. LexisNexis was not involved in Travelers’ decision to deny Plaintiff’s application for a surety bond and was not notified of Travelers’ reason for its decision.

FURTHER AFFIANT SAYETH NAUGHT.


Jelani Headley

Sworn to and subscribed before me
this 4th day of May, 2011


Notary Public

My Commission Expires: June 24, 2012



Exhibit 1



You must have this number when contacting the
LexisNexis® Consumer Center.

C.L.U.E.® Consumer Number: 1020002430

July 20, 2010

00335 1.00 MB 0.382 02

|||||
JAMES F. DINWIDDIE

1838 Marsh Trail Cir NE

Atlanta, GA 30328-5763

Thank you for contacting LexisNexis® Risk Solutions Inc. ("LexisNexis") to obtain your credit information in accordance with Section 609 of the Fair Credit Reporting Act ("FCRA"). LexisNexis is a consumer reporting agency that collects, maintains and uses information to create "consumer reports", as that term is defined under the FCRA. Consumer reports may be created at the request of LexisNexis customers that have a permissible purpose to access the reports under the FCRA. While LexisNexis delivers consumer reports to the insurance industry, we are not involved in decisions made by insurance companies based on the reports or scores, and we are not provided information regarding those decisions. For questions regarding those decisions, please contact the insurance company that ordered your report.

The credit bureau that provided your information to us will be mailing the requested report to you directly. To protect your privacy, your report may be sent in an unmarked envelope and should arrive within 2 weeks. **You will not receive a copy of your credit file from LexisNexis since we are merely a reseller of the credit report, nor will LexisNexis receive a copy of your report.**

It is important for consumers to know the differences between a credit score and an insurance score.

A credit score is a reflection of an individual's credit rating and financial performance. An individual's credit report may contain no negative factors from the standpoint of decisions made with respect to the granting of credit, but at the same time could indicate a greater or lesser degree of risk that an insurance loss will occur.

An insurance score is a numerical value associated with an individual based on an evaluation of his or her credit report and is a predictor of the likelihood of a future insurance loss. Statistical correlations have been proven to exist between various characteristics contained in a credit report and the frequency of insurance losses.

After you receive your credit report from the credit bureau, review it carefully. Consumers have the right to dispute any information they believe is inaccurate or incomplete. To do this, you can either contact the credit bureau directly using the toll-free number or web site address provided with your report or you may contact LexisNexis to file a dispute on your behalf. Please wait until you receive your credit report before calling or initiating a dispute. Once the dispute reinvestigation is complete, the results will be provided to you in writing.

If you have any further questions, you may contact us by phone at (866) 323-0932. The LexisNexis Consumer Center's hours of operation are Monday – Friday from 8AM to 7PM Eastern Time.

Thank you for allowing us to assist you.
LexisNexis Consumer Center

NOTE: Phone calls to the LexisNexis Consumer Center may be monitored for quality assurance. For more information about credit reports and insurance scores, please visit www.consumerdisclosure.com. Select **Reports**, then **Credit Reports/Insurance Scores**.

Exhibit 2



#5

Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010

Page 1 of 14
www.experian.com/disputes

Before contacting us, you should carefully review this report.

Disputing information in your report

If you disagree with an item, you may dispute it. We will contact the source of the information and ask them to check their records. Because your report is updated often, contact us within 90 days from the date above.

For the fastest and easiest way to dispute information, visit:

www.experian.com/disputes

Or call 1 800 509 8495. Dispute services are available 24 hours a day, seven days a week.



*****MIXED AADC 530
0005677 3 MB 0.629 L 719 7
JAMES FREDRICK DINWIDDIE
1838 MARSH TRAIL CIR NE
ATLANTA GA 30328-5763



Your personal credit report

Potentially negative items or items for further review

The most common items in this section are late payments, accounts that have been charged off or sent to collection, bankruptcies, liens, and judgments. It also may contain items that are not necessarily negative, but that a potential creditor might want to review more closely, such as an account that has been settled or transferred.

Accounts in good standing

Items display in this section when your creditor reports that you have satisfactorily met the terms of your agreements with them. Some creditors may not report consumer credit information to us, so all of your accounts may not be listed.

History of your account balances

Reports up to two years of your monthly balances on an account, if reported by your creditor.

Requests for your credit history

We list anyone that has reviewed your credit information in the last two years.

Personal information

This information is reported to us by you, your creditors and other sources.

Tools to manage your personal credit

What's your credit score?

Find out by ordering your VantageScore® from Experian for only \$7.95. To order your VantageScore®, call 1 888 322 5583.

Credit Manager

Receive unlimited access to your credit report, score and other credit management tools at www.creditexpert.com.

About Experian

Experian collects and organizes information about you and your credit history from public records, your creditors and other reliable sources. By law, we cannot disclose certain medical information (relating to physical, mental, or behavioral health or condition). Although we do not generally collect such information, it could appear in the name of a data furnisher (i.e., "Cancer Center") that reports your payment history to us. If so, those names display in your report, but in reports to others they display only as "Medical Information Provider". Consumer statements included on your report at your request that contain medical information are disclosed to others.

EXHIBIT 2 - 1

0140161494

L-719-05677-0107020





Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013

Page 2 of 14

Potentially negative items or items for further review

This information is generally removed seven years from the initial missed payment that led to the delinquency. Missed payments and most public record items may remain on the credit report for up to seven years, except Chapters 7, 11 and 12 bankruptcies and unpaid tax liens, which may remain for up to 10 years. A paid tax lien may remain for up to seven years. Transferred accounts that have not been paid due remain up to 10 years after the date the account was transferred.

Public records

SAN DIEGO COUNTY REC	Identification number	Date filed	Responsibility	Claim amount	Status
1600 PACIFIC HWY STE 260	SQL20100226418	May 2010	Individual	\$2,078	State tax lien filed.
SAN DIEGO CA 92101		Date resolved		Liability amount	Address identification number: 182414986
(619) 531-5231		NA		NA	

Credit items

CAPITAL ONE	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
PO BOX 3028:	Jan 2005	Feb 2007	Revolving	Individual	NA	\$0 as of Feb 2007	Closed. Account history: 30 days past due as of Oct 2006
SALT LAKE CITY UT 84130	Reported since	Last reported	Terms		High balance	Recent Payment	Comment: Account closed at consumer's request.
(800) 955-7070	Jan 2005	Feb 2007	NA		\$2,149	\$962	Address identification number: 582367165
Partial account number			Monthly payment				
412174252402....			\$28				

SALLIE MAE	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
11100 USA PKWY	Nov 2004	Jun 2005	Installment	Individual	\$13,948	\$3,096 as of Jun 2010	Open. Account history: 120 days past due as of May 2005 90 days past due as of Apr 2005
FISHERS IN 46037	Reported since	Last reported	Terms		High balance	Recent Payment	As of Jan 2012, this account is scheduled to go to a positive status.
(888) 272-5543	Dec 2004	Jun 2010	70 Months		NA	\$225	Your Statement: "ITEM DISPUTED BY CONSUMER"
Partial account number			Monthly payment				This item was verified and updated on Nov 2006.
9315809816100092004....			\$225				Address identification number: 66351525

See History of account balances for additional information.

0140161494 L-719-05677-0107000





Prepared for
JAMES FREDRICK DINWIDDLE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013

Page 3 of 14

Accounts in good standing

These items may stay on your credit report for as long as they are open. Once an account is closed or paid off it may continue to appear on your report for up to ten years.

Credit items

CHASE BANK USA	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
PO BOX 15298 WILMINGTON DE 19850 (800) 955-9900	Feb 1999	Apr 2002	Revolving	Individual	\$1,000	NA	Status: Closed/Never late. This account is scheduled to continue on record until May 2012. Comment: "Account closed at consumer's request."
Partial account number 447945290024....	Mar 1999	May 2002	NA	Monthly payment	High balance \$997		Address identification number: 368493636

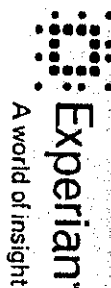
FIRST ELECTRONIC BANK	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
280 W 10200 S STE 200 SANDY UT 84070 No phone number available	Jul 2006	Feb 2009	Revolving	Individual	\$1,100	NA	Status: Paid, Closed/Never late. This account is scheduled to continue on record until Feb 2019. Comment: "Account closed at consumer's request."
Partial account number 504926101016....	Jul 2006	Feb 2009	NA	Monthly payment	High balance \$854		Address identification number: 582367165

See History of account balances for additional information.

GEMB/BANANA REP	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
PO BOX 981400 EL PASO TX 79998 (800) 234-7455	Mar 1999	Jul 2004	Revolving	Individual	NA	NA	Status: Transferred, closed. This account is scheduled to continue on record until Jul 2014. Creditor's statement: "Purchased by another lender."
Partial account number 601859000083....	Jul 2004	Jul 2004	NA	Monthly payment	High balance NA		This item was verified and updated on Nov 2007. Address identification number: 210642848

0140161494 L-719-05677-0207000





Accounts in good standing continued

Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013

Page 4 of 14

HSBC AUTO FINANCE	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status: Paid/Closed/Never late.
PO BOX 17904	Jun 2005	Nov 2008	Installment	Individual	\$15,664	NA	This account is scheduled to continue on record until Nov 2018.
SAN DIEGO CA 92177	Reported since	Last reported	Terms		High balance		Address identification number: 664199246
(800) 418-1888	Jul 2005	Nov 2008	60 Months		NA		
Partial account number			Monthly payment				
5000010099....			NA				

See History of account balances for additional information.

HSBC BANK	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status: Paid/Closed/Never late.
PO BOX 5253	Mar 2006	Jan 2007	Revolving	Individual	\$400	NA	This account is scheduled to continue on record until Jan 2017.
CAROL STREAM IL 60197	Reported since	Last reported	Terms		High balance		Comment: "Account closed at consumer's request."
(800) 477-6000	Apr 2006	Jan 2007	NA		\$396		Address identification number: 582367155
Partial account number			Monthly payment				
466309000302....			NA				

BEST BUY/HSBC	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status: Open/Never late.
PO BOX 15524	May 2010	Jul 2010	Revolving	Individual	\$900	\$699 as of Jul 2010	Address identification number: 66351525
WILMINGTON DE 19850	Reported since	Last reported	Terms		High balance		
(800) 677-2700	Apr 2010	Jul 2010	NA		\$698		
Partial account number			Monthly payment				
700106227871....			\$10				

See History of account balances for additional information.

0140161494

L-719-05677-0207000





Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013

Page 5 of 14

Accounts in good standing continued

MACYS		Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
PO BOX 8218		Jun 2010	Jul 2010	Revolving	Individual	NA	\$0 /paid as of Jul 2010	Open/Never late.
MASON OH 45040		Reported since	Last reported	Terms		High balance		Address identification number: 66351525
(800) 243-6552		Jul 2010	Jul 2010	NA		NA		
Partial account number				Monthly payment				
428103694....				NA				

MACYS		Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
PO BOX 8218		Jun 2010	Jul 2010	Revolving	Individual	NA	\$1,388 as of Jul 2010	Open/Never late.
MASON OH 45040		Reported since	Last reported	Terms		High balance		Address identification number: 66351525
(800) 243-6552		Jul 2010	Jul 2010	NA		NA		
Partial account number				Monthly payment				
428103694....				\$46				

SALLIE MAE		Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
11100 USA PKWY		Mar 1997	Nov 2004	Installment	Individual	\$2,563	NA	Transferred, closed/Never late.
FISHERS IN 46037		Reported since	Last reported	Terms		High balance		This account is scheduled to continue on record until Nov 2014.
(888) 272-5543		Apr 1997	Nov 2004	120 Months		NA		Creditor's statement: "Account transferred to another lender."
Partial account number				Monthly payment				Address identification number: 207601249
400356283....				NA				

SALLIE MAE		Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
11100 USA PKWY		Mar 1997	Nov 2004	Installment	Individual	\$2,937	NA	Transferred, closed/Never late.
FISHERS IN 46037		Reported since	Last reported	Terms		High balance		This account is scheduled to continue on record until Nov 2014.
(888) 272-5543		Apr 1997	Nov 2004	120 Months		NA		Creditor's statement: "Account transferred to another lender."
Partial account number				Monthly payment				Address identification number: 207601249
400356283....				NA				

0140161494

L-719-05677-0307000





Accounts in good standing continued

Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013
Page 6 of 14

SALLIE MAE	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
11100 USA PKWY FISHERS IN 46037 (888) 272-5543 <i>Partial account number</i> 400356283....	May 1997 Reported since May 1997	Nov 2004 Last reported Nov 2004	Installment Terms 120 Months Monthly payment NA	Individual	\$2,750 High balance NA	NA	Status: Transferred, closed/never late. This account is scheduled to continue on record until Nov 2014. Creditor's statement: "Account transferred to another lender." Address identification number: 207601249

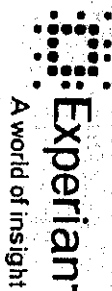
SALLIE MAE	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
11100 USA PKWY FISHERS IN 46037 (888) 272-5543 <i>Partial account number</i> 400356283....	Oct 1997 Reported since Oct 1997	Nov 2004 Last reported Nov 2004	Installment Terms 120 Months Monthly payment NA	Individual	\$4,370 High balance NA	NA	Status: Transferred, closed/never late. This account is scheduled to continue on record until Nov 2014. Creditor's statement: "Account transferred to another lender." Address identification number: 207601249

SALLIE MAE	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
11100 USA PKWY FISHERS IN 46037 (888) 272-5543 <i>Partial account number</i> 400356283....	Oct 1997 Reported since Oct 1997	Nov 2004 Last reported Nov 2004	Installment Terms 120 Months Monthly payment NA	Individual	\$1,130 High balance NA	NA	Status: Transferred, closed/never late. This account is scheduled to continue on record until Nov 2014. Creditor's statement: "Account transferred to another lender." Address identification number: 207601249

SALLIE MAE	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
11100 USA PKWY FISHERS IN 46037 (888) 272-5543 <i>Partial account number</i> 400356283....	Jun 1998 Reported since Jun 1998	Nov 2004 Last reported Nov 2004	Installment Terms 120 Months Monthly payment NA	Individual	\$2,750 High balance NA	NA	Status: Transferred, closed/never late. This account is scheduled to continue on record until Nov 2014. Creditor's statement: "Account transferred to another lender." Address identification number: 207601249

0140161494 L-719-05677-0307000





Accounts in good standing continued

Prepared for
JAMES FREDRICK DINWIDDLE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013

Page 7 of 14

SALLIE MAE	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status:
11100 USA PKWY	Sep 1998	Nov 2004	Installment	Individual	NA		Transferred, closed/never late.
FISHERS IN 46037	Reported since	Last reported	Terms		High balance		This account is scheduled to continue on record until Nov 2014.
(888) 272-5543	Sep 1998	Nov 2004	120 Months		NA		Creditor's statement: "Account transferred to another lender."
Partial account number			Monthly payment				Address identification number:
400356283....							20760 1249

History of your account balances

If your creditor reported your account balances to us, we list them in this section as additional information about your account. Your balance history may also include your credit limit and high balance or the original loan amount for an installment loan. Accounts listed are not duplicates of accounts displayed in public records or credit items.

SALLIE MAE

Partial account number
9315809816100092004....

Balance history

May 2010: \$3,312 Apr 2010: \$3,527 Mar 2010: \$3,742 Feb 2010: \$3,955 Jan 2010: \$4,170 Dec 2009: \$4,381 Nov 2009: \$4,593 Oct 2009: \$4,805 Sep 2009: \$5,015 Aug 2009: \$5,224 Jul 2009: \$5,434 Jun 2009: \$5,641 May 2009: \$5,849 Apr 2009: \$6,056 Mar 2009: \$6,262 Feb 2009: \$6,468 Jan 2009: \$6,675 Dec 2008: \$6,879 Nov 2008: \$7,082 Oct 2008: \$7,216 Sep 2008: \$7,487 Aug 2008: \$7,690 Jul 2008: \$7,891

The original amount of this account was \$13,948

FIRST ELECTRONIC BANK

Partial account number
504926101016....

Between Jul 2008 and Jan 2009, your credit limit/high balance was \$1,100

Balance history

Jan 2009: \$0 Dec 2008: \$0 Nov 2008: \$0 Oct 2008: \$0 Sep 2008: \$0 Aug 2008: \$0 Jul 2008: \$0

HSBC AUTO FINANCE

Partial account number
5000010099....

The original amount of this account was \$15,664

Balance history

Oct 2008: \$6,807 Sep 2008: \$7,093 Aug 2008: \$7,372 Jul 2008: \$7,648

BEST BUY/HSBC

Partial account number
700106227871....

Between Apr 2010 and Jun 2010, your credit limit/high balance was \$900

Balance history

Jun 2010: \$695 Apr 2010: \$0

0140161494

L-719-05677-0407000





A world of insight

Record of requests for your credit history

We make your credit history available to your current and prospective creditors and employers as allowed by law. Experian may list these inquiries for up to two years so that you will have a record of the companies that accessed your credit information.

Inquiries shared with others

The section below lists all of the companies that have reviewed your credit report as a result of an action you took, such as applying for credit or financing or as a result of a collection. The inquiries in this section are shared with companies that view your credit history.

MACYS/DSNB	Date	Reason
9111 DUKE BLVD	Jun 23, 2010	Permissible purpose. This inquiry is scheduled to continue on record until Jul 2012.
MASON OH 45040		
No phone number available		

Address identification number: 66351525

RESIDENTCHECK.COM	Date	Reason
4230 LBJ Fwy STE 407	Aug 19, 2009	Residential rental on behalf of DUNWOODY STATION. This inquiry is scheduled to continue on record until Sep 2011.
DALLAS TX 75244		
No phone number available		
Address identification number: 65998788		

Prepared for

JAMES FREDRICK DINWIDDLE

Report number

0132-7732-92

Report date

July 20, 2010

www.experian.com/disputes

PO BOX 9701, Allen, TX 75013

Page 8 of 14

Inquiries shared only with you

You may not have initiated the following inquiries, so you may not recognize each source. We report these requests to you only as a record of activities, and we do not include any of these requests on credit reports to others.

We offer credit information about you to those with a permissible purpose, for example to:

- other creditors who want to offer you preapproved credit;
- an employer who wishes to extend an offer of employment;
- a potential investor in assessing the risk of a current obligation;
- Experian Consumer Assistance to process a report for you;
- your current creditors to monitor your accounts (date listed may reflect only the most recent request);
- a static copy of your credit report provided to a subsequent user necessary to complete your mortgage loan application.

These inquiries do not affect your credit score.

LEXISNEXIS/INS/P&C	Date
1000 ALDERMAN DR	Jul 14, 2010
ALPHARETTA GA 30005	
No phone number available	
On behalf of TRAVELERS for insurance underwriting	
CIC/EXPERIAN CREDIT RPT	Date
PO BOX 19729	Apr 20, 2010
IRVINE CA 92623	
No phone number available	

EXPERIAN

	Date
PO BOX 9600	Apr 20, 2010
ALLEN TX 75013	
No phone number available	

CITIFINANCIAL

	Date
300 SAINT PAUL PL	Mar 2, 2010
BALTIMORE MD 21202	
No phone number available	

HSBC NV CARD SERVICES

	Date
12447 SW 69TH AVE	Dec 21, 2009; Sep 3, 2009
TIGARD OR 97223	
No phone number available	

HSBC NV CARD SERVICES

	Date
	Sep 3, 2009
No phone number available	

No phone number available





A world of insight

Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013

Page 9 of 14

Personal information

The following information is reported to us **by you, your creditors and/or other sources**. Each source may report your personal information differently, which may result in variations of your name, address, Social Security number, etc. As part of our fraud protection efforts, a notice with additional information may appear.

Names

JAMES F DINWIDDIE Jr
Name identification number: 30185
JAMES F DINWIDDIE
Name identification number: 18139
JAMES DINWIDDIE
Name identification number: 5190
JAMES DINWIDDIE Jr
Name identification number: 21405
JAMIE F DINWIDDIE Jr
Name identification number: 11188

Addresses

These addresses are listed in no particular order and may include previous addresses where you received mail. The Address identification number is how our system identifies the address and identifies which creditor, court or potential creditor reported the address to us. The geographical code shown with each address identifies the state, county, census tract, block group and Metropolitan Statistical Area associated with each address. These listings do not affect your credit score.

Type of address	Geographical code
1838 MARSH TRAIL NE CIR ATLANTA GA 30328-5763 Address identification number 0066351525	Single family 0-1010980-121-0520
8525 ARJONS DR STET SAN DIEGO CA 92126-4384 Address identification number 0182414986	Multifamily 0-835010-73-7320
348 E PACES FERRY NE RD APT B4 ATLANTA GA 30305-2325 Address identification number 0207601249	Apartment complex 0-960040-121-0520

WFCB/VENUE

4590 E BROAD ST
COLUMBUS OH 43213
Date
Jul 23, 2009; Jan 29, 2009
No phone number available

CAP ONE

PO BOX 30281
SALT LAKE CITY UT 84130
Date
Jun 1, 2009
No phone number available

WFCB/VENUE

4590 E BROAD ST
COLUMBUS OH 43213
Date
Jan 29, 2009
No phone number available

EXPERIAN

PO BOX 2002
ALLEN TX 75013
Date
Aug 21, 2008; May 19, 2008; Feb 10, 2008; Jan 23, 2008; Jun 30, 2006; May 26, 2006
No phone number available

EXPERIAN

701 EXPERIAN PKWY
ALLEN TX 75013
Date
Nov 15, 2007
No phone number available

EXPERIAN

PO BOX 2002
ALLEN TX 75013
Date
May 26, 2006
No phone number available





Personal information continued

	Type of address	Geographical code
405 S DALE MABRY HWY STE348 TAMPA FL 33609-2820 Address identification number 0516341049	Single family	0-580010-57-0520
405 S DALE MABRY HI WAY UNIT 348 TAMPA FL 33609- Address identification number 0664199246	Apartment complex	0-00-0-8280
5131 PEACHTREE RD ATLANTA GA 30341-2715 Address identification number 0582367165	Single family	0-2120820-89-
1804 GARNET AVE #479 SAN DIEGO CA 92109-3352 Address identification number 0617014918	Single family	0-790320-73-0520
77249 GENNAKER DR TAMPA FL 33607-5896 Address identification number 0290200087	Single family	0-1170830-57-0520
348 E PACES FERRY NE RD APTA ATLANTA GA 30305-2384 Address identification number 0210642848	Apartment complex	0-960040-121-7320
408 E PACES FERRY NE RD APTB4 ATLANTA GA 30305-3307 Address identification number 00478768780	Single family	0-960050-121-8280
1907 DELLE CHASE CIR TAMPA FL 33634- Address identification number 0368493636	Single family	0-00-0-0520
400 HARBOUR PLACE DR APT1455 TAMPA FL 33602-6723 Address identification number 0391326065	Apartment complex	0-510210-57-0520
348 E PACES FERRY NE RD ATLANTA GA 30305-2384 Address identification number 0065998788	Multifamily	0-960040-121-8280

Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013

	Type of address	Geographical code
500 S HIMES AVE TAMPA FL 33609-3973 Address identification number 0075365543	Multifamily	0-570040-57-0520
405 S DALE MABRY HWY TAMPA FL 33609-2820 Address identification number 0075362122	Single family	0-580010-57-
1804 GARNET AVE SAN DIEGO CA 92109-3352 Address identification number 0250563180	Single family	0-790320-73-8280

Social Security number variations

As a security precaution, we did not list the Social Security number that you provided when you contacted us. The numbers below are variations that have been reported to us. Only the last four digits of each reported variation are displayed. Numbers that appear here vary from the number you used to generate this report. Actual differences in the numbers may be part of the displayed portion or part of the hidden portion.

None

Date of birth
Jul 13, 1974

Telephone numbers
619 750 7333
770 952 8549
813 418 9700

Employers
TAMPA WHOLESALE DIRECT
RECREATIONAL DIRECT WAR
GOVERNORS CLUB 202 HALF ADAMS ST TALLAHASSEE FL 32304-

Notices
This address has pertained to a business: 8525 ARJONS DR STE T SAN DIEGO CA 92126
FOOD PRODUCTS MANUFACTURER: 8525 ARJONS DR STE T, SAN DIEGO, CA, 92126





---End of Report---

If you disagree with information in your report you may dispute it at:
www.experian.com/disputes

You may also visit www.experian.com to view your report again.

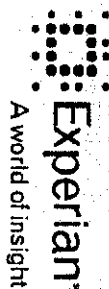
Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013

Page 11 of 14

0140161494 L-719-05677-0607000





Dispute form

For the fastest and easiest way to dispute information, visit:
www.experian.com/disputes

You may also mail this form to: **Experian, P.O. Box 9701, Allen, TX 75013**
 Or, call us for assistance at 1 800 509 8495

Use this form for any disputes you wish to submit by mail.

Complete all of the following information and submit by mail, within 90 days from the report date listed above. Once we receive your dispute, it may take up to 30 days (or up to 45 days for an investigation of information in an annual free credit report) to complete our investigation with the source of the disputed information. We will then notify you of the results. You may make copies of this form to submit additional disputes or use a separate piece of paper.

Remember, most accurate negative information will remain a part of your credit history for up to seven years and bankruptcies and unpaid tax liens for up to 10 years. Experian is regulated by federal law and we cannot remove information that has been verified as accurate from your credit report.

What's your credit score? Find out by ordering your VantageScore® for only \$7.95.

- ☐ Send my VantageScore® (Score will include investigation results of any disputes submitted on this form. Make check or money order payable to Experian.)
- ☐ Request overnight delivery via FedEx for an additional \$20 to receive your score report before investigation is completed.

Intentionally making any false statements could be punishable by law.

Your current identification information (correct any incorrect information)
Fill in your Social Security number: _____
(We cannot honor your request without your Social Security number.)
Current Mailing Address: 1838 MARSH TRAIL CIR NE ATLANTA GA 30328-5763
Year of birth: _____
Enter your email address to be notified when your results are ready: _____

Is any of the information below incorrect on your report?

- ☐ Spouse's name ☐ Telephone number - Which one is incorrect? _____
- ☐ Employer - Which one is incorrect? _____
- ☐ Date of birth - Fill in your correct date of birth: ____/____/____
- ☐ Address - Which one is incorrect? _____

Prepared for
 JAMES FREDRICK DINWIDDLE
Report number
 0132-7732-92

Report date
 July 20, 2010
 www.experian.com/disputes
 PO BOX 9701, Allen, TX 75013
Page 12 of 14

First dispute

- Company name:** _____
- Your partial account number:** _____
- I believe this item is incorrect because **(Choose only one)**:
- ☐ Payment never late ☐ Account closed ☐ Paid in full - On what date? ____/____/____
 - ☐ Account included in bankruptcy - Chapter: ____ Filing date: ____/____/____
 - ☐ Not my account - Who does it belong to? _____
 - ☐ Other - Must explain: _____

Second dispute

- Company name:** _____
- Your partial account number:** _____
- I believe this item is incorrect because **(Choose only one)**:
- ☐ Payment never late ☐ Account closed ☐ Paid in full - On what date? ____/____/____
 - ☐ Account included in bankruptcy - Chapter: ____ Filing date: ____/____/____
 - ☐ Not my account - Who does it belong to? _____
 - ☐ Other - Must explain: _____

Third dispute

- Company name:** _____
- Your partial account number:** _____
- I believe this item is incorrect because **(Choose only one)**:
- ☐ Payment never late ☐ Account closed ☐ Paid in full - On what date? ____/____/____
 - ☐ Account included in bankruptcy - Chapter: ____ Filing date: ____/____/____
 - ☐ Not my account - Who does it belong to? _____
 - ☐ Other - Must explain: _____

0140161494

L-719-05677-0607000





Georgia Consumers Have the Right to Obtain a Security Freeze

You have a right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. A security freeze must be requested in writing by certified mail or by electronic means as provided by a consumer reporting agency. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your applications for credit. You should plan ahead and lift a freeze in advance of actually applying for new credit. When you place a security freeze on your credit report, you will be provided a personal identification number or password to use if you choose to remove the freeze on your credit report or authorize the release of your credit report for a period of time after the freeze is in place.

To provide that authorization you must contact the consumer reporting agency and provide all of the following:

- (1) The personal identification number or password.
- (2) Proper identification to verify your identity.
- (3) The proper information regarding the period of time for which the report shall be available.

A consumer reporting agency must authorize the release of your credit report no later than fifteen (15) minutes after receiving the above information if the request is by electronic means or by telephone, or no later than three business days when a written request is submitted.

A security freeze does not apply to a person or entity, or its affiliates, or collection agencies acting on behalf of the person or entity, with which you have an existing account, that requests information in your credit report for the purposes of reviewing or collecting the account. Reviewing the account includes activities related to account maintenance. You have a right to bring civil action against anyone, including a consumer reporting agency, who improperly obtains access to a file, knowingly or willfully misuses file data, or fails to correct inaccurate file data. Unless you are a victim

Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013

Page 13 of 14

of identity theft with a police report or other official document acceptable to a consumer reporting agency to verify the crimes, or you are 65 or older, a consumer reporting agency has the right to charge you a fee of no more than \$3.00 to place a freeze on your credit report.





Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013
Page 14 of 14

THIS PAGE INTENTIONALLY LEFT BLANK

0140161494 L-719-05677-0707000



Exhibit 3

Date: 7/29/10

AUG 25 2010

To: LexisNexis, Inc.
125 Park Ave., Ste 2200
New York, NY 10017-5529

From: James F. Dinwiddie Jr.
1838 Marsh Trail Circle
Atlanta, GA 30328

RE: Request for credit file given to Travelers Insurance that resulted in my denial of insurance bond

To Whom IT May Concern:

I recently applied for an insurance bond from Travelers Insurance and was denied due to information given to them by your company. I am officially asking that you provide me with a COMPLETE copy of the credit file provided by you LexisNexis/ChoicePoint. I called to make a request by phone only to be offered a report from Experian by an automated voice. I want your report, not theirs. Your report has been distributed by you and used against me to deny me credit and insurance and by law – as I am sure you well know – you are obligated to give me the copy of your file that you submitted to Travelers.

I have never heard of your organization.

Let me be clear...I am not asking for a separate file given by Equifax or Experian. I am requesting YOUR file. I had a problem with my credit not long ago and I am afraid that negative information that should not have been on my credit may still be on your report so please do not jerk me around and give me the report issued by another bureau. Based on my inquiries you may be "affiliated" with other bureaus but you are technically separate so please do not test my patience and hide behind another bureau such as Experian. Federal Law – as I am sure you are aware – requires you to give me a free copy of the exact report you gave to Travelers Insurance. Please mail me a copy of your file asap. My information is as follows:

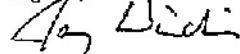
James F. Dinwiddie, Jr.
1838 Marsh Trail Circle
Atlanta, GA 30328

DOB: **REDACTED**
Last 4 of SSN: **REDACTED**

Should I receive anything other than your report I will file suit.

THIS IS AN ATTEMPT TO CORRECT YOUR RECORDS AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

Regards,



James F. Dinwiddie JR.

1020002430

Exhibit 4



September 7, 2010

James F. Dinwiddie Jr.
1838 Marsh Trail Circle
Atlanta, GA 30328

Re: Request for credit file

Dear Mr. Dinwiddie:

I want to first apologize for our delay in responding to your letter dated 7/29/10. Apparently, the letter was sent to a LexisNexis address in New York, NY and I assume there was confusion as to where this letter should have been routed to.

Informatively, LexisNexis® is a leading global provider of content-enabled workflow solutions to professionals in law firms, corporations, government, law enforcement, tax, accounting, academic institutions and risk and compliance assessment. LexisNexis Risk Solutions, which is where your letter was ultimately routed to, is a part of LexisNexis® and is a consumer reporting agency that provides various reports to businesses at their request. LexisNexis Risk Solutions also allows consumers to order, view and dispute these reports.

In your letter, you asked to provide you "with a complete copy of the credit file provided by you LexisNexis/ChoicePoint". You also stated that you did not want a report from Experian. LexisNexis Risk Solutions does not have a credit file on you and therefore we would not be able to send you a credit file. We are able to provide you with the credit file that was obtained from Experian and provided to Travelers. Informatively, we use the credit file from Experian to create a score and provide that to an insurance company. This would not appear on the credit report from Experian because LexisNexis Risk Solutions creates this score. Your score was a 708. This is the only additional item that we are able to provide you with in relation to the credit report that was used by Travelers.

We ordered a copy of your credit report from Experian on 7/20/10 and a report should have been sent out from their offices shortly thereafter. We also sent you a copy of our claims history report for property, officially known as a C.L.U.E. Property report. If you did not receive either item, please let me know.

EXHIBIT 4 - 1

LexisNexis® Risk Solutions

LexisNexis Consumer Center PO Box 105108 • Atlanta, GA 30348 • lexisnexis.com/risk



In conclusion, we did provide you with a free copy of the information that was provided to Travelers as covered by the FCRA (Fair Credit Reporting Act). If you would like further information that we store in regards to you, you can visit personalreports.lexisnexis.com. This will not include any credit data as we do not store credit data on you. This annual free report is covered by the FACT (Fair and Accurate Credit Transaction) Act.

If you have any further questions or concerns, please use my contact information below and I'll be glad to assist you.

Sincerely,

Jelani
LexisNexis Consumer Center
Manager of Operations
888-497-0011 ext. 24620

Consumer Number 1020002430

EXHIBIT 4 - 2

LexisNexis® Risk Solutions

LexisNexis Consumer Center PO Box 105108 • Atlanta, GA 30348 • lexisnexis.com/risk

Exhibit B

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JAMES F. DINWIDDIE, JR.,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION
)	NO.: 1:10-cv-03516-RLV-ECS
)	
LEXISNEXIS RISK SOLUTIONS)	
INC.,)	
Defendant.)	

AFFIDAVIT OF BRET HOBSON

STATE OF GEORGIA,
COUNTY OF FULTON.

Personally appeared before the undersigned officer, duly authorized to administer oaths, Bret Hobson, being first duly sworn deposed and said:

1. I am over the age of eighteen and otherwise competent to testify to the matters stated below based on my personal knowledge.
2. My name is Bret Hobson, and I am counsel for Defendant LexisNexis Risk Solutions Inc. ("LexisNexis") in the above-styled matter.
3. A true and correct copy of a letter from Surety Consultants, Inc. to Plaintiff James F. Dinwiddie, Jr., which Plaintiff served on LexisNexis during discovery in this case, is attached hereto as Exhibit 1.
4. A true and correct copy of Plaintiff's Answers to Defendant's

Requests for Admission, which Plaintiff served on LexisNexis during discovery in this case, is attached hereto as Exhibit 2.


5. A true and correct copy of Plaintiff's Answer to Defendant's First Interrogatories, which Plaintiff served on LexisNexis during discovery in this case, is attached hereto as Exhibit 3.

6. A true and correct copy of the third-party subpoena that Plaintiff served on Travelers Insurance Company during discovery in this case is attached hereto as Exhibit 4.

FURTHER AFFIANT SAYETH NAUGHT.


Bret Hobson

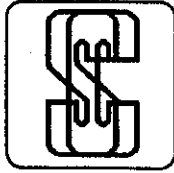
Sworn to and subscribed before me
this 4th day of May, 2011


Notary Public

My Commission Expires: May 9, 2011



Exhibit 1



SURETY CONSULTANTS, INC.

MONTREAL 2000 OFFICE PARK
2785 LAWRENCEVILLE HWY., SUITE 208
DECATUR, GEORGIA 30033
(770) 908 - 1000

Mr. James F. Dinwiddie Jr.
1838 Marsh Trail Circle
Sandy Springs GA 30328

8-16-10

RE: Travelers Declination Of Used Car Dealer Bond

Mr. Dinwiddie:

Based at least partially upon information found in a consumer credit report provided by Choicepoint Services Inc. (Choicepoint), Travelers is unable to provide you with the above referenced surety bond. This decision was made by Travelers and not Choicepoint, which is therefore unable to provide the reasons for the decision. You have the right to obtain a free copy of your credit report from Choicepoint at the telephone number and address listed below, provided you make the request within sixty days. In addition you may contact this consumer credit reporting agency to dispute the accuracy or completeness of the information in the file by contacting them as follows:

Choicepoint Consumer Service Center
P.O. Box 105108
Atlanta GA 30348-5108

1-800-456-6004

Sincerely

Terry A. Scroggs
President

Exhibit 2

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JAMES F. DINWIDDIE, JR.,)	
)	
Plaintiff,)	
)	
V.)	CIVIL ACTION
)	NO.: 1:10-cv-03516-RLV-ECS
)	
LEXISNEXIS RISK SOLUTIONS INC.,)	
)	
Defendant.)	

ANSWERS TO DEFENDANTS REQUESTS FOR ADMISSION

1. No material difference exists between the credit report Defendant caused Experian to send you and the credit report that Travelers relied on to deny you an insurance bond, as alleged in your Complaint.

Response: Deny.

2. No material difference exists between the credit report Travelers relied on to deny you an insurance bond, as alleged in your Complaint, and the credit report Experian sent to you following your letter to Defendant dated July 29, 2009, which letter requested that Defendant provide you with "a

COMPLETE copy of the credit file provided by you LexisNexis/Choicepoint” to Travelers.

Response: Deny. One report was issued by Choicepoint while the other was issued by Experian. One report was 2 pages whereas the other report was 14 pages. One report contained information the other report did not, such as a tax lien.

3. Following your letter to Defendant dated July 29, 2009, which letter requested that Defendant provide you with “a COMPLETE copy of the credit file provided by you LexisNexis/Choicepoint” to Travelers, Defendant caused Experian to send you a copy of your credit report from Experian.

Response: Admit.

4. Following your letter to Defendant dated July 29, 2009, you received a complete copy of your credit report from Experian.

Response: Admit.

5. You cannot identify any information Defendant provided to Travelers, which Travelers relied on to deny you an insurance bond as alleged in your Complaint, that was not provided to you in response to your request to Defendant

Response: Admit. That is the frustrating part of this argument and scenario, because after all of this I still do not have the reason(s) I was denied, because by law Travelers does not have to provide me with reasons why they denied me. They only have to disclose what CRA they used to get information, and when you have a company like Reed Elsevier and LexisNexis that has many different subsidiaries that provide background information – some of which acknowledge they are a CRA and some of which do not – it becomes nearly impossible to figure out what is being said about a particular consumer. The burden of production falls on the CRA and the Defendant in turn just conveniently passes the burden on to a completely separate entity.

6. Prior to serving a subpoena on Reed Elsevier during the pendency of this case, you never communicated directly with Reed Elsevier Inc., nor has Reed Elsevier communicated with you.

Response: Admit.

7. Accurint is a brand of a product offered by Defendant.

Response: Admit.

8. Accurint is not a company.

Response: Admit.

9. After Travelers denied you an insurance bond, as described in your Complaint, you successfully obtained a similar or equivalent insurance bond from another company.

Response: Admit.

10. Other than Travelers, no other company denied you an insurance bond.

Response: Admit.

- 11.No material difference in cost, coverage, terms, or value exists between the bond you allegedly attempted to obtain from Travelers and any similar or equivalent bond you eventually obtained from any other company.

Response: Admit. Does this imply that it is o.k. for LexisNexis to break the law as long as the consumer is able to get insurance elsewhere?

- 12.No material difference in cost exists between the bond you allegedly attempted to obtain from Travelers and any similar or equivalent bond you eventually obtained from any other company.

Response: Admit.

- 13.No material difference in coverage exists between the bond you allegedly attempted to obtain from Travelers and any similar or equivalent bond you eventually obtained from any other company.

Response: Admit

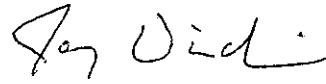
14.No material difference in terms exists between the bond you allegedly attempted to obtain from Travelers and any similar or equivalent bond you eventually obtained from any other company.

Response: Admit.

15.No material difference in value exists between the bond you allegedly attempted to obtain from Travelers and any similar or equivalent bond you eventually obtained from any other company.

Response: Admit

Respectfully submitted this 24th day of March, 2011.



James F. Dinwiddie, Jr.
Plaintiff
Pro Se
1838 Marsh Trail Circle
Atlanta, GA 30328
404-952-8549
Jayd124@hotmail.com

Certificate of Service

I do hereby certify that I have this 24th day of March, 2011 served a copy of the foregoing ANSWER TO REQUEST FOR ADMISSIONS upon Bret Hobson, attorney for Defendant, by mail (USPS) as follows:

Bret Hobson
Bondurant, Mixon & Elmore
3900 One Atlantic Center
1201 West Peachtree Street, N.W., Ste 3900
Atlanta, GA 30309-3417

A handwritten signature in black ink, appearing to read "Bret Hobson", with a long horizontal line extending to the right.

Exhibit 3

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JAMES F. DINWIDDIE, JR.,

Plaintiff,

V.

LEXISNEXIS RISK SOLUTIONS INC.,

Defendant.

)
)
)
)
)
)
)
)
)
)

CIVIL ACTION

NO.: 1:10-cv-03516-RLV-ECS

ANSWER TO DEFENDANTS FIRST INTERROGATORIES

1. Identify each person who has knowledge, either directly or indirectly, of any of the relevant facts, events, circumstances, or issues formed by the subject matter of this litigation, and describe the subject matters of which that person has knowledge.

Answer: Lisa Harai; Travelers Companies, Legal Services ; 860-954-4088

- Ms. Harai is the person I spoke to regarding the subpoena that I served on Travelers and is also the person that handled the subpoena.

- 2. Identify all persons you have interviewed, spoken to, emailed, or otherwise communicated with in connection with this lawsuit and, for each person you identify, indicate whether you have or have not obtained a written statement from such person relating to the dispute(s) underlying this case.**

Answer: A. Lisa Harai; Travelers Companies, 860-954-4088.

I have not obtained a written report from this individual.

B. Terry Scroggs; Surety Consultants, INC., 2785 Lawrenceville Hwy, Ste 208, Decatur, GA, 30033; 770-908-1000.

I have not obtained a written statement from this person.

- 3. Describe in detail any difference between the credit report Travelers relied on to deny you an insurance bond, as alleged in you Complaint, and the credit report Experian sent you following your letter to Defendant dated July 29, 2009, which letter requested that Defendant provide you with "a COMPLETE copy of the credit file provided by you LexisNexis/Choicepoint" to Travelers.**

Answer: First, the report that Experian sent me was 14 pages and the report that LexisNexis released to me is only 2 pages. The reports are not identical. For example, one report shows a lien while the other one does

not. One report was generated and issued by Choicepoint while the one I was sent was generated and issued by a completely separate company known as Experian. Even if the reports were identical (which they are not), it would not change the fact that LexisNexis failed to honor the FCRA mandated burden of producing their file – given they are a CRA.

4. Explain in detail the factual support and legal bases for you claim(s) in your Complaint, and identify the persons and documents upon which you will rely to prove each such fact or facts.

Answer: Simply put, the Federal Trade Commission Act (FCRA), section 609, very clearly states that “every consumer reporting agency shall, upon request, and subject to 610(a)(1), clearly and accurately disclose to the consumer all information in the consumers file at the time of the request.” The FCRA places the burden of production with the entity that generated the report and as a self described CRA (as stated in one of the letters sent to Plaintiff by Defendant) LexisNexis is responsible for the report – not Experian. Even if the reports were identical (which they clearly are not), which company would be held liable should Experian fail to send a copy of the report within the 30 day timeframe allowed by the FCRA? Does the consumer seek action against Experian? Of course not.

With regards to documents that support my claim I have two separate reports from two separate companies, along with letters from LexisNexis and the insurance agent that all ultimately support my claim..

- 5. Explain in detail the factual support and legal bases for you claim(s) in your Proposed Amended Complaint, and identify the persons and documents upon which you would rely to prove each such fact or facts.**

Answer: LexisNexis Risk Solutions is owned by company Reed Elsevier. Plus, I have presented case law that shows where the US District Court of Massachusetts allowed it in the case of Varad v. Reed Elsevier LexisNexis, civil action 06-cv-11370-MLW.

- 6. Explain in detail the factual support and legal bases for alleging that Reed Elsevier is legally liable to you, including but not limited to any factual support and legal bases for holding Reed Elsevier liable for the alleges actions of Defendant.**

Answer: Reed Elsevier is liable because they own Choicepoint, Inc. and Choicepoint is the company named as the CRA in the denial that was sent out by Traverlars.

7. Explain in detail the factual support for alleging that Accurint is a company and not a brand.

Answer: LexisNexis Accurint itself claims -- at the bottom of its home page on its website -- that:

“The Accurint® services are not provided by “consumer reporting agencies,” as that term is defined in the Fair Credit Reporting Act (15 U.S.C. § 1681, et seq.) (“FCRA”) and do not constitute “consumer reports,” as that term is defined in the FCRA. Accordingly, the Accurint service may not be used in whole or in part as a factor in determining eligibility for credit, insurance, employment or for other eligibility determination purposes that would qualify the service as a consumer report under the FCRA.

This is the exact opposite of what was written in a LexisNexis Risk Solutions letter that was sent to me after I requested my file that stated:

“LexisNexis is a consumer reporting agency that collects, maintains and uses information to create ‘consumer reports’, as that term is defined under the FCRA. “

It is only reasonable to assume that they are separate companies. If they are not, then why the need for two separate names and the need to make two totally different websites, contact information etc.? It shows how LexisNexis and Reed Elsevier have designed a grand scheme to circumvent the FCRA.

8. Identify all documents you sent to or received from Reed Elsevier or Accurint, including but not limited to all communications between you and Reed Elsevier or Accurint.

Answer: I have not received or sent anything to either Reed Elsevier or Accurint.

9. Identify all documents you sent to or received from Defendant, including but not limited to all communications between you and Defendant.

Answer: See attached: Answer to #9

10. Describe in detail your attempt to obtain an insurance bond from Travelers, as alleged in your Complaint, and Travelers' response thereto.

Answer: In August of 2010 I attempted to secure a bond from Surety Consultants, Inc. in Decatur, GA, an agent of Travelers Companies. Upon denial I received a letter stating that my bond had been denied based "at least partially upon information found in a consumer credit report provided by Choicepoint Services Inc." I then sent in a letter requesting copy of my

file/report. In return I received a letter from LexisNexis Risk Solutions stating that they are in fact a CRA but would not be producing my file as they are only a reseller of reports. I then received a copy of Experians' file that showed nothing negative. I then sent a second letter requesting my file and received a response dated September 7, 2010 that stated LexisNexis did not have file (which by now is clearly untrue) and that they only have what is known as a CLUE report. They issued that which is a page of rambling numbers with no significance whatsoever. It also showed nothing negative. After two attempts and the refusal to produce my file, I was forced to file suit.

11. Describe in detail the cost, coverage, terms, and value of the insurance bond you attempted to obtain from Travelers, as alleged in your Complaint, and your reasons seeking such an insurance bond.

Answer: The application that I submitted to Travelers was for a \$30k bond that was needed to complete the requirements mandated by the state to get an Automobile Dealers License.

12. Identify each person with whom you have communicated regarding your attempt to obtain an insurance bond from Travelers, as alleged in your Complaint.

Answer: Terry Scroggs; Surety Consultants, Inc. , 2785 Lawrenceville Hwy Ste 208, Lawrenceville, GA, 30033; phone 770-908-1000.

13. Identify all documents and communications related to your attempt to obtain an insurance bond from Travelers, as described in your Complaint, including but not limited to any documents evidencing the cost, coverage, terms, or value of such insurance bond.

Answer: See attached: Answer to #13

14. Identify all documents you have sent to or received from Travelers related to this lawsuit, including but not limited to any documents Travelers provided in response to any subpoena you served on it.

Answer: See attached: Answer to #14 (2 page credit report issued by Choicepoint/LexisNexis)

15. Describe in detail any previous or subsequent attempts, whether successful or unsuccessful, to obtain from any company other than

Travelers an insurance bond similar to or equivalent to the insurance bond you attempted to obtain from Travelers, as alleged in your Complaint, and any such company's response thereto.

Answer: After being denied, I successfully secured a bond from another insurance company known as GA Insurance Associates, Inc. This was done thru the same agent Western Surety.

16. Describe in detail the cost, coverage, terms, and value of any insurance bond you eventually obtained from any company other than Travelers similar to or equivalent to the bond you attempted to obtain from Travelers, as alleged in your Complaint.

Answer: \$30k bond that cost approximately \$500.

17. Identify each person with whom you have communicated regarding any attempt, whether successful or unsuccessful, to obtain from any company other than Travelers an insurance bond similar to or equivalent to the insurance bond you attempted to obtain from Travelers, as alleged in your Complaint.

Answer: None

18. Identify all documents and communications related to any attempt by you, whether successful or unsuccessful, to obtain from any company other than Travelers an insurance bond equivalent to or similar to the insurance bond you attempted to obtain from Travelers as described in your Complaint, including but not limited to any documents evidencing the cost, coverage, terms, or value of any such insurance bonds.

Answer: I do not have a copy of the application that was initially submitted because it was done over the phone if I recall. The agent then took that same application and submitted to a separate organization that approved the bond because my guess is – and this is only a guess – they did not use reports provided by or sold by Choicepoint, or any of their subsidiaries, or parent company Reed Elsevier, or “brands” such as LexisNexis Accurint.

I have attached a copy of the bond that was eventually obtained through Western Surety Company. See attached Answer to #18.

19. Identify all documents and communications you have sent or received in relation to any subpoena you served in this case, including but

limited to all documents you received in response to any subpoena you served in this case.

Answer: None other than that two page report from Choicepoint that I have already attached and the Production of Documents that Defendants counsel provided to me on Jan. 26, 2011.

20.Describe in detail any material differences, including but not limited to differences in cost, coverage, terms, or value, between the bond you allegedly attempted to obtain from Travelers and any similar or equivalent bond you eventually obtained from any other company.

Answer: No difference – same request through separate company.
Same request, coverage, terms and value.

21.State in detail the financial amount or value of each type of relief or damages to which you claim you are entitled in your Complaint, explain how the amount or value was calculated, and state the factual and legal bases, if any, for your contention that such relief is necessary or appropriate with respect to your claim(s).

Answer: \$1000 for violation of the FCRA section 609(a) and 609(c).

Punitive damages in the amount of \$50,000 for the willful and deliberate refusal to produce file upon request, plus cost.

22.State in detail the financial amount or value of each type of relief or damages to which you claim you are entitled in your Proposed Amended Complaint, explain how the amount or value was calculated, and state the factual and legal basis, if any, for your contention that such relief is necessary or appropriate with respect to your claim(s).

Answer : \$1000 for violation of the FCRA section 609(a) and 609(c). Punitive damages in the amount of \$50,000 for willful and deliberate violation of the FCRA, plus cost.

23.Describe in detail any evidence that you possess tending to demonstrate the Defendant willfully violated the Fair Credit Reporting Act.

Answer: All of the correspondence between Plaintiff and Defendant including the 53 page file that was produced as Production of Documents, the letters received from Travelers that state Travelers, the two page credit report from Travelers that names Choicepoint as the provider of said report

(not Experian) and letter from insurance agent stating that information obtained from Defendant was used to deny insurance. The Defendant has gone to great lengths to cover up the fact that they are not just a “reseller” of reports from other institutions. The Defendant has basically lied in saying that they did not distribute a report and that they do not have a file on the Plaintiff. It is willful and deliberate. In letter that was sent from LexisNexis on September 7, 2010 in response to the “request for file”, LexisNexis flat out lied when in paragraph 3 they state “LexisNexis Risk Solutions does not have a credit file on you and therefore would not be able to send you a credit file. We are able to provide you with the credit file that was obtained from Experian to create a score and provide that to an insurance company.” The two page report received from Travelers was not sent by Experian, it was very clearly sent by Choicepoint and it was different in multiple ways.

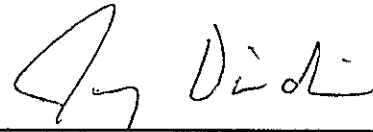
24. Identify all documents and communications related to the credit report that Experian sent to you following your letter to Defendant dated July 29, 2009, which letter requested that Defendant provide you with a “COMPLETE copy of the credit file provided by you” to Travelers.

Answer: See attached: Answer to #24 (Experian credit report)

25. Identify any documents you have provided to or received from any person whom you will call or may call as a testifying expert witness.

Answer: None.

Respectfully submitted this 24th day of March, 2011.


A handwritten signature in black ink, appearing to read "J. Dinwiddie", written over a horizontal line.

James F. Dinwiddie, Jr.
Plaintiff
Pro Se
1838 Marsh Trail Circle
Atlanta, GA 30328
404-952-8549
Jayd124@hotmail.com

Certificate of Service

I do hereby certify that I have this 24th day of March, 2011 served a copy of the foregoing RESPONSE TO DEFENDANT INTERROGATORIES upon Bret Hobson, attorney for Defendant, by mail (USPS) as follows:

Bret Hobson
Bondurant, Mixon & Elmore
3900 One Atlantic Center
1201 West Peachtree Street, N.W., Ste 3900
Atlanta, GA 30309-3417


James F. Dinwiddie, Jr.

Answer to #9

p-1



You must have this number when contacting the
LexisNexis® Consumer Center.

C.L.U.E.® Consumer Number: 1020002430

July 20, 2010

00335 1.00 MB 0.382 02

|||||

JAMES F. DINWIDDIE
1838 Marsh Trail Cir NE
Atlanta, GA 30328-5763

Thank you for contacting LexisNexis® Risk Solutions Inc. ("LexisNexis") to obtain your credit information in accordance with Section 609 of the Fair Credit Reporting Act ("FCRA"). LexisNexis is a consumer reporting agency that collects, maintains and uses information to create "consumer reports", as that term is defined under the FCRA. Consumer reports may be created at the request of LexisNexis customers that have a permissible purpose to access the reports under the FCRA. While LexisNexis delivers consumer reports to the insurance industry, we are not involved in decisions made by insurance companies based on the reports or scores, and we are not provided information regarding those decisions. For questions regarding those decisions, please contact the insurance company that ordered your report.

The credit bureau that provided your information to us will be mailing the requested report to you directly. To protect your privacy, your report may be sent in an unmarked envelope and should arrive within 2 weeks. **You will not receive a copy of your credit file from LexisNexis since we are merely a reseller of the credit report, nor will LexisNexis receive a copy of your report.**

It is important for consumers to know the differences between a credit score and an insurance score.

A credit score is a reflection of an individual's credit rating and financial performance. An individual's credit report may contain no negative factors from the standpoint of decisions made with respect to the granting of credit, but at the same time could indicate a greater or lesser degree of risk that an insurance loss will occur.

An insurance score is a numerical value associated with an individual based on an evaluation of his or her credit report and is a predictor of the likelihood of a future insurance loss. Statistical correlations have been proven to exist between various characteristics contained in a credit report and the frequency of insurance losses.

After you receive your credit report from the credit bureau, review it carefully. Consumers have the right to dispute any information they believe is inaccurate or incomplete. To do this, you can either contact the credit bureau directly using the toll-free number or web site address provided with your report or you may contact LexisNexis to file a dispute on your behalf. Please wait until you receive your credit report before calling or initiating a dispute. Once the dispute reinvestigation is complete, the results will be provided to you in writing.

If you have any further questions, you may contact us by phone at (866) 323-0932. The LexisNexis Consumer Center's hours of operation are Monday – Friday from 8AM to 7PM Eastern Time.

Thank you for allowing us to assist you.
LexisNexis Consumer Center

NOTE: Phone calls to the LexisNexis Consumer Center may be monitored for quality assurance. For more information about credit reports and insurance scores, please visit www.consumerdisclosure.com. Select **Reports**, then **Credit Reports/Insurance Scores**.



You must have these numbers when contacting the
C.L.U.E. Inc. Consumer Center.

C.L.U.E.® Consumer Number: 1020002429

C.L.U.E.® Reference Number: 09639092324539

July 20, 2010

00276 2.00 MB 0.507 02

|||||

JAMES F. DINWIDDIE
1838 Marsh Trail Cir NE
Atlanta, GA 30328-5763

Enclosed is the C.L.U.E. (Comprehensive Loss Underwriting Exchange) Report you requested, along with a guide to help you understand your Report. This Report includes the most current information available.

Please note that the Inquiry History section of the report provides a list of all insurance carriers that have requested this type of report about you within the past two years. If you believe any of the information on your Report is incorrect and you wish to file a dispute, or if the information is correct and you wish to include an explanation regarding a loss on your report, please either write to us or call us toll-free at 1-888-497-0011, Monday - Friday, 8:00AM - 7:00PM, Eastern Time. Please include the following information in your correspondence:

- The C.L.U.E. Consumer Number listed at the top of this letter and on your report.
- The claim number and insurance company name associated with the loss you wish to dispute or explain.
- Whether you wish to DISPUTE the loss record or EXPLAIN it.
- A BRIEF description of the facts, as you know them.

Any explanation you submit regarding a loss will appear on all future reports containing such loss record.

If you wish to dispute a loss, we will contact the insurance company that provided the information to notify them of your dispute. If the insurance company informs us that the disputed information is inaccurate, we will update the loss accordingly. However, if the insurance company informs us that the disputed information is accurate, the information will remain unchanged. As stated above, if you wish to add a statement to a loss, you may do so.

Thank you for giving us the opportunity to assist you.

C.L.U.E. Inc. Consumer Center
P.O. Box 105108
Atlanta, GA 30348-5108

NOTE: Phone calls to the C.L.U.E. Inc. Consumer Center may be monitored for quality assurance.

C.L.U.E. - COMPREHENSIVE LOSS UNDERWRITING EXCHANGE

PERSONAL PROPERTY SYSTEM

Inq Page: 1

Quoteback:

CD1020002429

Account: 990300-CDC Special Billing ID:
CHOICEPOINT CONSUMER CTR

Date of Order: 07/19/10

Date of Receipt: 07/19/10

Requestor:

C.L.U.E. Ref. #: 99900061800189

RECAP: RISK - 0 Claim(s) Reported
SUBJECT - 0 Claim(s) Reported

----- SEARCH REQUEST -----

Subject #1 Name: DINWIDDIE, JAMES
D.O.B.: 07/XX/XX SSN: 400-35-XXXX Sex:

Risk Address: 1838 MARSH TRAIL CIR NE
ATLANTA, GA 30328-5763

----- INQUIRY HISTORY -----

Subject 1:
08/27/09 STATE FARM FIRE & CAS CO
(27211 H4PZOY955KN00WZWSRM5KN00W

If you have questions, contact:

ChoicePoint Consumer Center
P. O. Box 105108
Atlanta, Georgia 30348-5108
Telephone: 1-888-497-0011

Georgia Consumers Have the Right to Obtain a Security Freeze.

You have a right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. A security freeze must be requested in writing by certified mail or by electronic means as provided by a consumer reporting agency. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your applications for credit. You should plan ahead and lift a freeze in advance of actually applying for new credit. When you place a security freeze on your credit report, you will be provided a personal identification number or password to use if you choose to remove the freeze on your credit report or authorize the release of your credit report for a period of time after the freeze is in place.

To provide that authorization you must contact the consumer reporting agency and provide all of the following:

- (1) The personal identification number or password.
- (2) Proper identification to verify your identity.
- (3) The proper information regarding the period of time for which the report shall be available.

A consumer reporting agency must authorize the release of your credit report no later than fifteen (15) minutes after receiving the above information if the request is by electronic means or by telephone, or no later than three business days when a written request is submitted.

A security freeze does not apply to a person or entity, or its affiliates, or collection agencies acting on behalf of the person or entity, with which you have an existing account, that requests information in your credit report for the purposes of reviewing or collecting the account. Reviewing the account includes activities related to account maintenance. You have a right to bring civil action against anyone, including a consumer reporting agency, who improperly obtains access to a file, knowingly or willfully misuses file data, or fails to correct inaccurate file data. Unless you are a victim of identity theft with a police report or other official document acceptable to a consumer reporting agency to verify the crimes, or you are 65 or older, a consumer reporting agency has the right to charge you a fee of no more than \$3.00 to place a freeze on your credit report.

Para informacion en espanol, visite www.ftc.gov/credit o escribe a la FTC Consumer Response Center, Room 130-A 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

A Summary of Your Rights Under the Fair Credit Reporting Act

The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Here is a summary of your major rights under the FCRA. **For more information, including information about additional rights, go to www.ftc.gov/credit or write to: Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.**

- **You must be told if information in your file has been used against you.** Anyone who uses a credit report or another type of consumer report to deny your application for credit, insurance, or employment – or to take another adverse action against you – must tell you, and must give you the name, address, and phone number of the agency that provided the information.
- **You have the right to know what is in your file.** You may request and obtain all the information about you in the files of a consumer reporting agency (your “file disclosure”). You will be required to provide proper identification, which may include your Social Security number. In many cases, the disclosure will be free. You are entitled to a free file disclosure if:
 - a person has taken adverse action against you because of information in your credit report;
 - you are the victim of identity theft and place a fraud alert in your file;
 - your file contains inaccurate information as a result of fraud;
 - you are on public assistance;
 - you are unemployed but expect to apply for employment within 60 days.

In addition, all consumers are entitled to one free disclosure every 12 months upon request from each nationwide credit bureau and from nationwide specialty consumer reporting agencies. See www.ftc.gov/credit for additional information.

- **You have the right to ask for a credit score.** Credit scores are numerical summaries of your credit-worthiness based on information from credit bureaus. You may request a credit score from consumer reporting agencies that create scores or distribute scores used in residential real property loans, but you will have to pay for it. In some mortgage transactions, you will receive credit score information for free from the mortgage lender.

States may enforce the FCRA, and many states have their own consumer reporting laws. In some cases, you may have more rights under state law. For more information, contact your state or local consumer protection agency or your state Attorney General. Federal enforcers are:

TYPE OF BUSINESS:	CONTACT:
Consumer reporting agencies, creditors and others not listed below	Federal Trade Commission: Consumer Response Center - FCRA Washington, DC 20580 1-877-382-4357
National banks, federal branches/agencies of foreign banks (word "National" or initials "N.A." appear in or after bank's name)	Office of the Comptroller of the Currency Compliance Management, Mail Stop 6-6 Washington, DC 20219 800-613-6743
Federal Reserve System member banks (except national banks, and federal branches/agencies of foreign banks)	Federal Reserve Board Division of Consumer & Community Affairs Washington, DC 20551 202-452-3693
Savings associations and federally chartered savings banks (word "Federal" or initials "F.S.B." appear in federal institution's name)	Office of Thrift Supervision Consumer Complaints Washington, DC 20552 800-842-6929
Federal credit unions (words "Federal Credit Union" appear in institution's name)	National Credit Union Administration 1775 Duke Street Alexandria, VA 22314 703-519-4600
State-chartered banks that are not members of the Federal Reserve System	Federal Deposit Insurance Corporation Consumer Response Center, 2345 Grand Avenue, Suite 100 Kansas City, Missouri 64108-2638 1-877-275-3342
Air, surface, or rail common carriers regulated by former Civil Aeronautics Board or Interstate Commerce Commission	Department of Transportation, Office of Financial Management Washington, DC 20590 202-366-1306
Activities subject to the Packers and Stockyards Act, 1921	Department of Agriculture Office of Deputy Administrator - GIPSA Washington, DC 20250 202-720-7051



C.L.U.E.[®] Personal Property How to Read Your Report

C.L.U.E., the Comprehensive Loss Underwriting Exchange, is a loss history information exchange provided by LexisNexis® Risk Solutions Inc. It enables insurance companies to access and use prior loss information in the underwriting process. Each month, participating insurers submit loss information to the C.L.U.E. information exchange, which is loaded to the C.L.U.E. database. Subsequently, insurance companies request this data by forwarding search criteria such as an insurance applicant's name, risk address, date of birth, and Social Security Number. The C.L.U.E. system searches its database for information that matches the requested search criteria. A C.L.U.E. report is then generated and forwarded to the insurer. When you or your insurance company receives a C.L.U.E. report, it includes all losses associated with the search criteria that were reported to us within **seven years** of the date of the request.

1 This section includes information that identifies your specific report.

2 This section summarizes the information that appears in the report.
NOTE: Losses are reported in two categories; risk and subject.

Identity Plus (ID+) is reported in four categories:

- Identity Found
- Identity Found - Possible Conflict
- No Identity Found
- Not Processed

3 This section consists of information that the insurance company provided as search criteria.

4 This section lists loss information that matches the **Risk** address given by the insurance company. (The loss information that does not exactly match the search criteria is underlined.)

NOTE: The loss information listed in this section **may not be related** to the subjects because the loss may have occurred before the subjects acquired the property. LexisNexis encourages the insurance company to independently verify this information prior to making a decision about your policy.

(a) Location of Loss:

ON PREM = the loss occurred on the insured property
OFF PREM = the loss occurred off the insured property

(b) Claim Date/Age: Indicates the date the loss occurred and the age of the claim.

(c) Cause of Loss: represents the reason the claim was submitted.

ACDDL = Accidental Discharge/leakage	LIGHT = Lightning
APPL = Appliance Related Water	LIVES = Livestock
COLL = Collision, Upset, Overturn	MEDIC = Medical Payment
CONTA = Contamination	MOLD = Mold
CRAFT = Watercraft	MOVE = Earth Movement
CREDIT = Credit Card	OTHER = All Other
DAMAG = Damage to Property of Others	PHYDA = Physical Damage (All Other)
DISAP = Mysterious Disappearance	QUAKE = Earthquake
DISSC = Mysterious Disappearance of Scheduled Property	SINK = Sink Hole
DOG = Dog Bite	SLIP = Slip/Fall
EXTEN = Extended Coverage Perils	SMOKE = Smoke
FIRE = Fire	THEFT = Theft/Burglar
FLOOD = Flood	THFSC = Theft - Scheduled
FOROB = Intake of Foreign Objects	VMM = Vandalism/Malicious
FREEZ = Freezing Water	WATER = Water Damage
HAIL = Hail	WC = Worker's Compensation
LAE = Loss Adjustment Expense	WEATH = Weather Related Water
LIAB = Liability	WIND = Wind

(continued on following page)

SAMPLE REPORT

1 C.L.U.E. COMPREHENSIVE LOSS UNDERWRITING EXCHANGE PERSONAL PROPERTY SYSTEM

Quoteback:	Inq Page: 1
Account: 999999XXX	Date of Order: 03/25/05
LexisNexis Consumer Ctr	Date of Receipt: 03/25/05
Requester:	C.L.U.E. Ref #123456789012

2 RECAP: C.L.U.E.
 RISK - 1 Claim(s) Reported
 SUBJECT - 1 Claim(s) Reported
 ID+ - PROCESSED - IDENTITY FOUND

3 SEARCH REQUEST

Subject #1 Name:
 CAESAR, JULIUS
 D.O.B.: 10/21/51 SSN: 999-99-9999 Sex: M
 Telephone: (999) 999-9999

Subject #2 Name:
 CAESAR, CORNELIA
 D.O.B.: 04/19/51 SSN: 999-99-9999 Sex: F
 Telephone: (999) 999-9999

Policy #: X99999999999
 Type: H Company: ANY INSURANCE COMPANY

Risk Address:
 9999 EASY STREET
 HOMETOWN, FL 99999-9999

Mailing Address:
 P O BOX 999999
 ANY TOWN, GA 99999-9999

Former Address:
 999 MAIN STREET
 SMALL TOWN, GA 99999

Mortgagee Name: MY BANK & TRUST
 Loan: X999999999

4 REPORTED CLAIMS HISTORY FOR RISK

Reported loss history with identification information that is underlined may not apply to the risk and should be verified prior to use. This report is not a recommendation. Subscriber should independently determine what action, if any to take.

---CLUE File #---	AM BEST #	---Claim Number---
Claim -Policy Type & Company---	---Policy Number---	Cause Amount
Date/Age-----	Insured/Risk Address-----	of Loss Paid

c/d e
a 01/17/05 9999999999999999 99999 B999999999 WIND/C 7,500
0yr-02mo b H NORTH POLE MUTUAL X99999999
f CAT RELATED g*CAESAR, GAUUS (INSRD) h
i ON PREM 9999 EASY STREET
HOMETOWN, FL 99999-9999
DOB: 10/21/51 SEX: M SSN: 999-99-9999
Telephone:(999) 999-9999
Mortgagee: STATE MORTGAGE COMPANY
Loan #: X999999999

(continued on following page)

p. 8

FREQUENTLY ASKED QUESTIONS

Q: Can I get an exact copy of the report my insurance company received?

A: C.L.U.E. Information may be updated daily. Therefore, we can provide you with a copy of your C.L.U.E. report as it currently exists.

Q: Why was my insurance canceled? OR Why was my premium increased?

A: Only your insurance agent or company representative can answer these questions. LexisNexis is not involved in the insurance company's decision-making process. Our only role is to provide information to the insurance company so they can properly assess each risk according to their individual criteria.

Q: Don't you need my permission to provide information about me?

A: When you applied for insurance, you gave the insurance company a permissible purpose to access information necessary in the underwriting process. An insurance company may obtain information from an outside source (such as an information reporting company) and inform you of the name of that outside source.

Q: Who do I contact if the search request information is incorrect?

A: Contact your insurance company to correct inaccurate search request information. It is provided to LexisNexis by the insurance company.

Q: Can I correct information on my report?

A: Upon review of your report, you may want to enter a statement explaining the loss more fully, or you may want to challenge the accuracy of specific information an insurance company provided. LexisNexis Insurance Consumer Center associates are eager to help you clarify or amend your C.L.U.E. report. We will verify the information with the reporting insurance company and notify you of the results within 30 days. Also, if your C.L.U.E. report contains items you feel deserve an explanation, we will be glad to add your personal statement to the C.L.U.E. report and include it in all future C.L.U.E. reports.

To add a statement or dispute a loss record, call or write us at the address below. Identify the specific loss by forwarding the following information:

- the C.L.U.E. reference or consumer number
- the name of the insurance company and the date of the loss
- a brief explanation of the facts (as you know them) pertaining to the challenged information

www.consumerdisclosure.com
LexisNexis® Consumer Center
P.O. Box 105108
Atlanta, Georgia 30348-5108
1-888-497-0011 (Toll Free); Monday – Friday, 8:00 AM to 7:00 PM Eastern Time

NOTE: Phone calls to our Consumer Center may be monitored for quality assurance.

p. 9

September 7, 2010

James F. Dinwiddie Jr.
1838 Marsh Trail Circle
Atlanta, GA 30328

Re: Request for credit file

Dear Mr. Dinwiddie:

I want to first apologize for our delay in responding to your letter dated 7/29/10. Apparently, the letter was sent to a LexisNexis address in New York, NY and I assume there was confusion as to where this letter should have been routed to.

Informatively, LexisNexis® is a leading global provider of content-enabled workflow solutions to professionals in law firms, corporations, government, law enforcement, tax, accounting, academic institutions and risk and compliance assessment. LexisNexis Risk Solutions, which is where your letter was ultimately routed to, is a part of LexisNexis® and is a consumer reporting agency that provides various reports to businesses at their request. LexisNexis Risk Solutions also allows consumers to order, view and dispute these reports.

In your letter, you asked to provide you "with a complete copy of the credit file provided by you LexisNexis/ChoicePoint". You also stated that you did not want a report from Experian. LexisNexis Risk Solutions does not have a credit file on you and therefore we would not be able to send you a credit file. We are able to provide you with the credit file that was obtained from Experian and provided to Travelers. Informatively, we use the credit file from Experian to create a score and provide that to an insurance company. This would not appear on the credit report from Experian because LexisNexis Risk Solutions creates this score. Your score was a 708. This is the only additional item that we are able to provide you with in relation to the credit report that was used by Travelers.

We ordered a copy of your credit report from Experian on 7/20/10 and a report should have been sent out from their offices shortly thereafter. We also sent you a copy of our claims history report for property, officially known as a C.L.U.E. Property report. If you did not receive either item, please let me know.

LexisNexis

P. 10

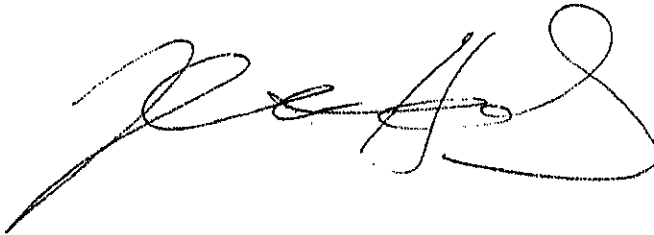
In conclusion, we did provide you with a free copy of the information that was provided to Travelers as covered by the FCRA (Fair Credit Reporting Act). If you would like further information that we store in regards to you, you can visit personalreports.lexisnexis.com. This will not include any credit data as we do not store credit data on you. This annual free report is covered by the FACT (Fair and Accurate Credit Transaction) Act.

If you have any further questions or concerns, please use my contact information below and I'll be glad to assist you.

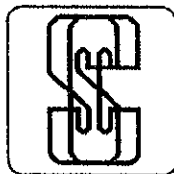
Sincerely,

Jelani
LexisNexis Consumer Center
Manager of Operations
888-497-0011 ext. 24620

Consumer Number 1020002430



Answer # 13



SURETY CONSULTANTS, INC.

MONTREAL 2000 OFFICE PARK
2785 LAWRENCEVILLE HWY., SUITE 208
DECATUR, GEORGIA 30033
(770) 908 - 1000

Mr. James F. Dinwiddie Jr.
1838 Marsh Trail Circle
Sandy Springs GA 30328

8-16-10

RE: Travelers Declination Of Used Car Dealer Bond

Mr. Dinwiddie:

Based at least partially upon information found in a consumer credit report provided by Choicepoint Services Inc. (Choicepoint), Travelers is unable to provide you with the above referenced surety bond. This decision was made by Travelers and not Choicepoint, which is therefore unable to provide the reasons for the decision. You have the right to obtain a free copy of your credit report from Choicepoint at the telephone number and address listed below, provided you make the request within sixty days. In addition you may contact this consumer credit reporting agency to dispute the accuracy or completeness of the information in the file by contacting them as follows:

Choicepoint Consumer Service Center

P.O. Box 105108

Atlanta GA 30348-5108

1-800-456-6004

Sincerely

Terry A. Scroggs
President

Answer to #14

P-1

Page1

ChoicePoint - National Credit File Report

RPT CODE - DESCRIPTION INDIV+NATLRISKPROC/COMPLETION STATUS CCHPTINC REFERENCE NBR 10595125646880TI
 CCHPTINC ACCT NAME TRAVELERS PROP CASUALTY

SECTION: MSSGE

REMARKS EXP/NATL RISK SCORE: 706 GA
 REMARKS PRESENCE OF NON-SATISFACTORY RATINGS ON ACCOUNTS OR LACK OF OPEN ACCOUNTS
 REMARKS BALANCES ON REVOLVING ACCOUNTS
 REMARKS NUMBER OF REVOLVING BANK ACCOUNTS
 REMARKS NUMBER OF CREDIT INQUIRIES
 REMARKS CONSUMER CREDIT INFORMATION IN THIS REPORT OBTAINED FROM EXPERIAN
 REMARKS NATIONAL CREDIT FILE FOR INSURANCE PURPOSES
 REMARKS A SUBSTANTIAL DIFFERENCE OCCURRED IN THE ADDRESS SUBMITTED FROM THOSE ON FILE
 REMARKS THE CURRENT ADDRESS ON THE CREDIT FILE DOES NOT MATCH ANY OF THE INPUT ADDRESSES
 REMARKS THE PRIOR ADDRESS ON THE CREDIT FILE DOES NOT MATCH ANY OF THE INPUT ADDRESSES
 REMARKS TRAVELERS IFS SCORE CODE: DIN-JAM-KZ9V-AGQ

SECTION: IDENT

DINWIDDIE JAMES F 000-00-0000

1838 MARSH TRAIL CIR NE ATLANTA GA 30328 5763DATE FIRST AT ADDRESS 10002009 7002010

8525 ARJONS DR T SAN DIEGO CA 92126 4384DATE FIRST AT ADDRESS 8002006 6002010

348 E PACES FERRY RD NE B4 ATLANTA GA 30305 2325DATE FIRST AT ADDRESS 6002003 8002009

SECTION: SUMRY

LATEST RPTG 07/2010FB N PR Y COLL N

HC - LOW AMT \$400.00HC - HIGH AMT \$15,664.00ONES 16HIST DEL TWOS 1REVOLVING TOT HC \$5,549.00INSTALL

SECTION: EMPLOY

EMPLOYER NAME TAMPA WHOLESALE DIRECT
 EMPLOYER NAME RECREATIONAL DIRECT WAR

SECTION: PR/LI

DATE FILED 05/05/2010CASE NBR SQ20100226418AMT OF LIEN \$2,078.00

SECTION: ACCNT

MEMBER	NAME	DATE REPORTED	DATE ACCT OPENED	HIGHEST CREDIT AMT	TERMS	ACCT BALANCE	PAST DUE AMT
GEMB/BANANA REP		07/2004	03/1999		REV		
CAP ONE		02/2007	01/2005	\$2,149.00	REV		
REMARKS 1 CREDIT LINE CLOSED							
CHASE BANK USA, NA		05/2002	02/1999	\$1,000.00	REV		
REMARKS 1 CREDIT LINE CLOSED							
FEB/FRYS		02/2009	07/2006	\$1,100.00	REV		
REMARKS 1 CREDIT LINE CLOSED							
HSBC BANK		01/2007	03/2006	\$400.00	REV		
REMARKS 1 CREDIT LINE CLOSED							

Page1

MCYDSNB	07/2010	06/2010		REV	\$1,388.00
MCYDSNB	07/2010	06/2010		REV	
HSBC/BSEBUY	06/2010	05/2010	\$900.00	REV	\$695.00
REMARKS 1 AMOUNT IN H/C COLUMN IS CREDIT LIMIT					
SALLIE MAE	11/2004	03/1997	\$2,563.00	120	
REMARKS 1 ACCOUNT TRANSFER OR SOLD					
SALLIE MAE	11/2004	03/1997	\$2,937.00	120	
REMARKS 1 ACCOUNT TRANSFER OR SOLD					
SALLIE MAE	11/2004	05/1997	\$2,750.00	120	
REMARKS 1 ACCOUNT TRANSFER OR SOLD					
SALLIE MAE	11/2004	10/1997	\$4,370.00	120	
REMARKS 1 ACCOUNT TRANSFER OR SOLD					
SALLIE MAE	11/2004	06/1998	\$2,750.00	120	
REMARKS 1 ACCOUNT TRANSFER OR SOLD					
SALLIE MAE	11/2004	10/1997	\$1,130.00	120	
REMARKS 1 ACCOUNT TRANSFER OR SOLD					
SALLIE MAE	11/2004	09/1998	\$2,615.00	120	
REMARKS 1 ACCOUNT TRANSFER OR SOLD					
HSBC AUTO	11/2008	06/2005	\$15,664.00	60	
REMARKS 1 PAID ACCOUNT/ZERO BALANCE					
SALLIE MAE	06/2010	11/2004	\$13,948.00	70	\$3,096.00
REMARKS 1 EDUCATION LOAN					
REMARKS 1 **CONSUMER STATEMENT** Y ITEM DISPUTED BY CONSUMER					

SECTION: INQHS

DATE OF INQUIRY 06/23/2010NAME OF INQUIRER MACYS/DSNB
DATE OF INQUIRY 08/19/2009NAME OF INQUIRER RESIDENTCHECK.COM
DATE OF INQUIRY 08/19/2009NAME OF INQUIRER RESIDENTCHECK.COM

*** ... End Of Report ... ***

Answer # 18

21



STATE BOARD OF REGISTRATION OF USED MOTOR VEHICLE DEALERS
& USED MOTOR VEHICLE PARTS DEALERS
USED MOTOR VEHICLE DIVISION
STATE OF GEORGIA
BOND

BOND NUMBER: 24791559Fulton COUNTY

KNOW ALL MEN BY THESE PRESENTS

That we, James F Dinwiddie, Jr. DBA Innovative Motor Sales, as Principal, and Western Surety Company as surety, are held and firmly bound unto H. R. EXCELLENCY, Governor of Georgia, and his successors in office in the just sum of THIRTY-FIVE THOUSAND AND NO/10 (\$35,000) DOLLARS, for the use and benefit of any purchasers of any used motor vehicle and their vendees or successors in title, for the payment of which, well and truly to be made, we bind ourselves, our heirs, executors and assigns, each and every one of them, jointly and severally, by these presents.

It is further understood and agreed that this bond is for a period beginning on the 23rd day of July, 2010, and ending on the 31st day of March, 2012.

James F Dinwiddie, Jr. DBA Innovative Motor Sales, Principal and Dealer, has made application to the State Board of Registration of Used Motor Vehicle Dealers and Used Motor Vehicle Parts Dealers for a license as a used motor vehicle dealer in accordance with the laws governing the used motor vehicle dealers of the State of Georgia:

NOW THEREFORE, the conditions of this obligation are such that if the above bound Principal shall comply with the conditions of any written contract or written warranty by such dealer or his agent, made in connection with the sale or exchange of any motor vehicle and shall pay all loss, damages, and expenses that may be sustained by any purchasers of any used motor vehicle and their vendees or successors in title by reason of any fraudulent misrepresentation as to liens against or titles to any used motor vehicle then the bond is to be void, otherwise it is to remain of full force and effect.

It is agreed that this bond is executed pursuant to and in accordance with the provisions of O.C.G.A. Section 43-47-8(g) et seq. Governing the registration of used motor vehicle dealers and used motor vehicle parts dealers in Georgia, and is intended to be and shall be construed to be a bond in compliance with the requirements thereof.

IN WITNESS WHEREOF, the Principal and Surety have caused these presents to be duly signed and executed under seal, this 22nd day of July, 2010.

James F Dinwiddie, Jr.
Signature of Licensee (Principal)

Western Surety Company
Surety—Name of Company

101 South Phillips Ave
Sioux Falls, SD 57104
Address

Countersigned:

[Signature]
Resident Agency

BY [Signature]
By Attorney-in-Fact

IMPORTANT: BOND MUST BE SIGNED - POWER OF ATTORNEY MUST BE ATTACHED

CANCELLATION CLAUSE - "No licensee shall cancel, or cause to be cancelled, a bond issued pursuant to the Code Section 43-47-8(l) unless the Board is informed in writing by a certified letter at least 30 days prior to the proposed cancellation." O.C.G.A. Section 43-47-8(l)

Western Surety Company

POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS:

That WESTERN SURETY COMPANY, a corporation organized and existing under the laws of the State of South Dakota, and authorized and licensed to do business in the States of Alabama, Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, District of Columbia, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin, Wyoming, and the United States of America, does hereby make, constitute and appoint

Terry A Scroggs of Decatur
State of Georgia

, with limited authority, its true and lawful Attorney-in-Fact, will full power and authority hereby conferred to sign, execute, acknowledge and deliver for and on its behalf as Surety and as its act and deed, the following bond:

One Used Motor Vehicle Dealer (Used Car Division)

bond with bond number 24791559

for James F Dinwiddie, Jr. DBA Innovative Motor Sales
as Principal in the penalty amount not to exceed: \$35,000.00

Western Surety Company further certifies that the following is a true and exact copy of Section 7 of the by-laws of Western Surety Company duly adopted and now in force, to-wit:

Section 7. All bonds, policies, undertakings, Powers of Attorney, or other obligations of the corporation shall be executed in the corporate name of the Company by the President, Secretary, any Assistant Secretary, Treasurer, or any Vice President, or by such other officers as the Board of Directors may authorize. The President, any Vice President, Secretary, any Assistant Secretary, or the Treasurer may appoint Attorneys-in-Fact or agents who shall have authority to issue bonds, policies, or undertakings in the name of the Company. The corporate seal is not necessary for the validity of any bonds, policies, undertakings, Powers of Attorney or other obligations of the corporation. The signature of any such officer and the corporate seal may be printed by facsimile.

In Witness Whereof, the said WESTERN SURETY COMPANY has caused these presents to be executed by its
Senior Vice President with the corporate seal affixed this 22nd day of July
2010.

ATTEST

A. Victor

A. Victor, Assistant Secretary

WESTERN SURETY COMPANY

By

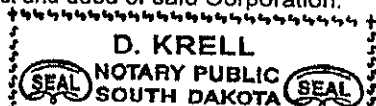
Paul T. Bruflat

Paul T. Bruflat, Senior Vice President

STATE OF SOUTH DAKOTA }
COUNTY OF MINNEHAHA } ss

On this 22nd day of July, 2010, before me, a Notary Public, personally appeared
Paul T. Bruflat and A. Victor

who, being by me duly sworn, acknowledged that they signed the above Power of Attorney as Senior Vice President and Assistant Secretary, respectively, of the said WESTERN SURETY COMPANY, and acknowledged said instrument to be the voluntary act and deed of said Corporation.



My Commission Expires November 30, 2012

Form 672-9-2006

D. Krell

Notary Public



A world of insight

Answer to #24

Before contacting us, you should carefully review this report.

Disputing information in your report

If you disagree with an item, you may dispute it. We will contact the source of the information and ask them to check their records. Because your report is updated often, contact us within 90 days from the date above.

For the fastest and easiest way to dispute information, visit:
www.experian.com/disputes

Or call 1 800 509 8495. Dispute services are available 24 hours a day, seven days a week.



*****MIXED AADC 530
0005677 3 MB 0.629 L 719 7
JAMES FREDRICK DINWIDDIE
1838 MARSH TRAIL CIR NE
ATLANTA GA 30328-5763



Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
Page 1 of 14
www.experian.com/disputes

Your personal credit report

Potentially negative items or items for further review

The most common items in this section are late payments, accounts that have been charged off or sent to collection, bankruptcies, liens, and judgments. It also may contain items that are not necessarily negative, but that a potential creditor might want to review more closely, such as an account that has been settled or transferred.

Accounts in good standing

Items display in this section when your creditor reports that you have satisfactorily met the terms of your agreements with them. Some creditors may not report consumer credit information to us, so all of your accounts may not be listed.

History of your account balances

Reports up to two years of your monthly balances on an account, if reported by your creditor.

Requests for your credit history

We list anyone that has reviewed your credit information in the last two years.

Personal information

This information is reported to us by you, your creditors and other sources.

Tools to manage your personal credit

What's your credit score?

Find out by ordering your VantageScore® from Experian for only \$7.95. To order your VantageScore®, call 1 888 322 5583.

Credit Manager

Receive unlimited access to your credit report, score and other credit management tools at www.creditempert.com.

About Experian

Experian collects and organizes information about you and your credit history from public records, your creditors and other reliable sources. By law, we cannot disclose certain medical information (relating to physical, mental, or behavioral health or condition). Although we do not generally collect such information, it could appear in the name of a data furnisher (i.e., "Cancer Center") that reports your payment history to us. If so, those names display in your report, but in reports to others they display only as "Medical Information Provider". Consumer statements included on your report at your request that contain medical information are disclosed to others.





Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013
Page 2 of 14

Potentially negative items or items for further review

This information is generally removed seven years from the initial missed payment that led to the delinquency. Missed payments and most public record items may remain on the credit report for up to seven years, except Chapters 7, 11 and 12 bankruptcies and unpaid tax liens, which may remain for up to 10 years. A paid tax lien may remain for up to seven years. Transferred accounts that have not been past due remain up to 10 years after the date the account was transferred.

Public records

SAN DIEGO COUNTY REC	Identification number	Date filed	Responsibility	Claim amount	Status
1600 PACIFIC HWY STE 260	SQ20100226418	May 2010	Individual	\$2,078	State tax lien filed.
SAN DIEGO CA 92101		Date resolved		Liability amount	Address identification number:
(619) 531-5231		NA		NA	182414986

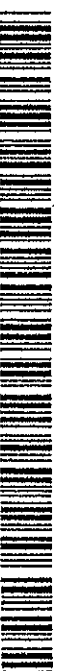
Credit items

CAPITAL ONE	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
PO BOX 30281	Jan 2005	Feb 2007	Revolving	Individual	NA	\$0 as of Feb 2007	Closed. Account history: 30 days past due as of Oct 2006
SALT LAKE CITY UT 84130	Reported since	Last reported	Terms		High balance	Recent Payment	Comment: "Account closed at consumer's request."
(800) 955-7070	Jan 2005	Feb 2007	NA		\$2,149	\$962	
Partial account number			Monthly payment				Address identification number: 582367165
412174252402....			\$28				

SALLIE MAE	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
11100 USA PKWY	Nov 2004	Jun 2005	Installment	Individual	\$13,948	\$3,096 as of Jun 2010	Open. Account history: 120 days past due as of May 2005
FISHERS IN 46037	Reported since	Last reported	Terms		High balance	Recent Payment	90 days past due as of Apr 2005
(888) 272-5543	Dec 2004	Jun 2010	70 Months		NA	\$225	As of Jan 2012, this account is scheduled to go to a positive status.
Partial account number			Monthly payment				Your Statement: "Y ITEM DISPUTED BY CONSUMER"
9315809816100092004....			\$225				This item was verified and updated on Nov 2006.

See history of account balances for additional information.

Address identification number: 66351525





Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013
Page 3 of 14

Accounts in good standing

These items may stay on your credit report for as long as they are open. Once an account is closed or paid off it may continue to appear on your report for up to ten years.

Credit items

CHASE BANK USA	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
PO BOX 15298	Feb 1999	Apr 2002	Revolving	Individual	\$1,000	NA	Status: Closed/Never late. This account is scheduled to continue on record until May 2012.
WILMINGTON DE 19850	Reported since	Last reported	Terms		High balance		Comment: "Account closed at consumer's request."
(800) 955-9900	Mar 1999	May 2002	NA		\$997		Address identification number: 368493636
Partial account number			Monthly payment				
447945290024....			NA				

FIRST ELECTRONIC BANK	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
280 W 10200 S STE 200	Jul 2006	Feb 2009	Revolving	Individual	\$1,100	NA	Status: Paid, Closed/Never late. This account is scheduled to continue on record until Feb 2019.
SANDY UT 84070	Reported since	Last reported	Terms		High balance		Comment: "Account closed at consumer's request."
No phone number available	Jul 2006	Feb 2009	NA		\$854		Address identification number: 582367165
Partial account number			Monthly payment				
504926101016....			NA				

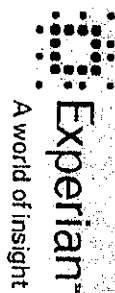
See History of account balances for additional information.

GEMB/BANANA REP	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
PO BOX 981400	Mar 1999	Jul 2004	Revolving	Individual	NA	NA	Status: Transferred, closed. This account is scheduled to continue on record until Jul 2014.
EL PASO TX 79998	Reported since	Last reported	Terms		High balance		Creditor's statement: "Purchased by another lender."
(800) 234-7455	Jul 2004	Jul 2004	NA		NA		This item was verified and updated on Nov 2007.
Partial account number			Monthly payment				Address identification number: 210642848
601859000083....			NA				

Status: Transferred, closed. This account is scheduled to continue on record until Jul 2014. Creditor's statement: "Purchased by another lender." This item was verified and updated on Nov 2007. Address identification number: 210642848

0140161494 L-719-05677-0207000





Accounts in good standing continued

Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013
Page 4 of 14

HSBC AUTO FINANCE	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
PO BOX 17904	Jun 2005	Nov 2008	Installment	Individual	\$15,664	NA	Status: Paid, Closed/Never late. This account is scheduled to continue on record until Nov 2018.
SAN DIEGO CA 92177	Reported since	Last reported	Terms		High balance		
(800) 418-1888	Jul 2005	Nov 2008	60 Months		NA		Address identification number: 664199246
Partial account number			Monthly payment				
5000010099,....			NA				

See History of account balances for additional information.

HSBC BANK	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
PO BOX 5253	Mar 2006	Jan 2007	Revolving	Individual	\$400	NA	Status: Paid, Closed/Never late. This account is scheduled to continue on record until Jan 2017.
CAROL STREAM IL 60197	Reported since	Last reported	Terms		High balance		Comment: "Account closed at consumer's request."
(800) 477-6000	Apr 2006	Jan 2007	NA		\$396		Address identification number: 582367165
Partial account number			Monthly payment				
466309000302,....			NA				

BEST BUY/HSBC	Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
PO BOX 15524	May 2010	Jul 2010	Revolving	Individual	\$900	\$699 as of Jul 2010	Status: Open/Never late. Address identification number: 66351525
WILMINGTON DE 19850	Reported since	Last reported	Terms		High balance		
(800) 677-2700	Apr 2010	Jul 2010	NA		\$698		
Partial account number			Monthly payment				
700106227871,....			\$10				

See History of account balances for additional information.

0140161494 L-719-05677-0207000





Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013
Page 5 of 14

Accounts in good standing continued

MACYS	<i>Date opened</i>	<i>Date of status</i>	<i>Type</i>	<i>Responsibility</i>	<i>Credit limit or original amount</i>	<i>Recent balance</i>	<i>Status</i>
PO BOX 8218	Jun 2010	Jul 2010	Revolving	Individual	NA	\$0 /paid as of Jul 2010	Open/Never late.
MASON OH 45040	<i>Reported since</i>	<i>Last reported</i>	<i>Terms</i>		<i>High balance</i>		Address identification number:
(800) 243-6552	Jul 2010	Jul 2010	NA		NA		66351525
Partial account number			<i>Monthly payment</i>				
428103694....			NA				

MACYS	<i>Date opened</i>	<i>Date of status</i>	<i>Type</i>	<i>Responsibility</i>	<i>Credit limit or original amount</i>	<i>Recent balance</i>	<i>Status</i>
PO BOX 8218	Jun 2010	Jul 2010	Revolving	Individual	NA	\$1,388 as of Jul 2010	Open/Never late.
MASON OH 45040	<i>Reported since</i>	<i>Last reported</i>	<i>Terms</i>		<i>High balance</i>		Address identification number:
(800) 243-6552	Jul 2010	Jul 2010	NA		NA		66351525
Partial account number			<i>Monthly payment</i>				
428103694....			\$46				

SALLIE MAE	<i>Date opened</i>	<i>Date of status</i>	<i>Type</i>	<i>Responsibility</i>	<i>Credit limit or original amount</i>	<i>Recent balance</i>	<i>Status</i>
11100 USA PKWY	Mar 1997	Nov 2004	Installment	Individual	\$2,563	NA	Transferred, closed/Never late.
FISHERS IN 46037	<i>Reported since</i>	<i>Last reported</i>	<i>Terms</i>		<i>High balance</i>		This account is scheduled to continue on record until Nov 2014.
(888) 272-5543	Apr 1997	Nov 2004	120 Months		NA		Creditor's statement: "Account transferred to another lender."
Partial account number			<i>Monthly payment</i>				Address identification number:
400356283....			NA				207601249

SALLIE MAE	<i>Date opened</i>	<i>Date of status</i>	<i>Type</i>	<i>Responsibility</i>	<i>Credit limit or original amount</i>	<i>Recent balance</i>	<i>Status</i>
11100 USA PKWY	Mar 1997	Nov 2004	Installment	Individual	\$2,937	NA	Transferred, closed/Never late.
FISHERS IN 46037	<i>Reported since</i>	<i>Last reported</i>	<i>Terms</i>		<i>High balance</i>		This account is scheduled to continue on record until Nov 2014.
(888) 272-5543	Apr 1997	Nov 2004	120 Months		NA		Creditor's statement: "Account transferred to another lender."
Partial account number			<i>Monthly payment</i>				Address identification number:
400356283....			NA				207601249

0140161494 L-719-05677-0307000





Accounts in good standing continued

Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013
Page 6 of 14

SALLIE MAE	<i>Date opened</i>	<i>Date of status</i>	<i>Type</i>	<i>Responsibility</i>	<i>Credit limit or original amount</i>	<i>Recent balance</i>	<i>Status</i>
11100 USA PKWY	May 1997	Nov 2004	Installment	Individual	\$2,750	NA	This account is scheduled to continue on record until Nov 2014.
FISHERS IN 46037	<i>Reported since</i>	<i>Last reported</i>	<i>Terms</i>		<i>High balance</i>		Creditor's statement: "Account transferred to another lender."
(888) 272-5543	May 1997	Nov 2004	120 Months		NA		Address identification number: 207601249
Partial account number							
400356283....							

SALLIE MAE	<i>Date opened</i>	<i>Date of status</i>	<i>Type</i>	<i>Responsibility</i>	<i>Credit limit or original amount</i>	<i>Recent balance</i>	<i>Status</i>
11100 USA PKWY	Oct 1997	Nov 2004	Installment	Individual	\$4,370	NA	This account is scheduled to continue on record until Nov 2014.
FISHERS IN 46037	<i>Reported since</i>	<i>Last reported</i>	<i>Terms</i>		<i>High balance</i>		Creditor's statement: "Account transferred to another lender."
(888) 272-5543	Oct 1997	Nov 2004	120 Months		NA		Address identification number: 207601249
Partial account number							
400356283....							

SALLIE MAE	<i>Date opened</i>	<i>Date of status</i>	<i>Type</i>	<i>Responsibility</i>	<i>Credit limit or original amount</i>	<i>Recent balance</i>	<i>Status</i>
11100 USA PKWY	Oct 1997	Nov 2004	Installment	Individual	\$1,130	NA	This account is scheduled to continue on record until Nov 2014.
FISHERS IN 46037	<i>Reported since</i>	<i>Last reported</i>	<i>Terms</i>		<i>High balance</i>		Creditor's statement: "Account transferred to another lender."
(888) 272-5543	Oct 1997	Nov 2004	120 Months		NA		Address identification number: 207601249
Partial account number							
400356283....							

SALLIE MAE	<i>Date opened</i>	<i>Date of status</i>	<i>Type</i>	<i>Responsibility</i>	<i>Credit limit or original amount</i>	<i>Recent balance</i>	<i>Status</i>
11100 USA PKWY	Jun 1998	Nov 2004	Installment	Individual	\$2,750	NA	This account is scheduled to continue on record until Nov 2014.
FISHERS IN 46037	<i>Reported since</i>	<i>Last reported</i>	<i>Terms</i>		<i>High balance</i>		Creditor's statement: "Account transferred to another lender."
(888) 272-5543	Jun 1998	Nov 2004	120 Months		NA		Address identification number: 207601249
Partial account number							
400356283....							

0140161494 L-719-05677-0307000





Accounts in good standing continued

Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013

Page 7 of 14

SALLIE MAE
11100 USA PKWY
FISHERS IN 46037
(888) 272-5543
Partial account number
400356283....

Date opened	Date of status	Type	Responsibility	Credit limit or original amount	Recent balance	Status
Sep 1998	Nov 2004	Installment	Individual	\$2,615	NA	Status: Transferred, closed/never late. This account is scheduled to continue on record until Nov 2014. Creditor's statement: "Account transferred to another lender." Address identification number: 207601249
Reported since Sep 1998	Last reported Nov 2004	Terms 120 Months		High balance NA		

Monthly payment
NA

History of your account balances

If your creditor reported your account balances to us, we list them in this section as additional information about your account. Your balance history may also include your credit limit and high balance or the original loan amount for an installment loan. Accounts listed are not duplicates of accounts displayed in public records or credit items.

SALLIE MAE
Partial account number
9315809816100092004....

Balance history
May 2010: \$3,312 Apr 2010: \$3,527 Mar 2010: \$3,742 Feb 2010: \$3,955 Jan 2010: \$4,170 Dec 2009: \$4,381 Nov 2009: \$4,593 Oct 2009: \$4,805 Sep 2009: \$5,015 Aug 2009: \$5,224 Jul 2009: \$5,434 Jun 2009: \$5,641 May 2009: \$5,849 Apr 2009: \$6,056 Mar 2009: \$6,262 Feb 2009: \$6,468 Jan 2009: \$6,675 Dec 2008: \$6,879 Nov 2008: \$7,082 Oct 2008: \$7,286 Sep 2008: \$7,487 Aug 2008: \$7,690 Jul 2008: \$7,891

The original amount of this account was \$13,948

FIRST ELECTRONIC BANK

Partial account number
504926101016....
Between Jul 2008 and Jan 2009, your credit limit/high balance was \$1,100

Balance history
Jan 2009: \$0 Dec 2008: \$0 Nov 2008: \$0 Oct 2008: \$0 Sep 2008: \$0 Aug 2008: \$0 Jul 2008: \$0

HSBC AUTO FINANCE

Partial account number
5000010099....

The original amount of this account was \$15,664

Balance history
Oct 2008: \$6,807 Sep 2008: \$7,093 Aug 2008: \$7,372 Jul 2008: \$7,648

BEST BUY/HSBC

Partial account number
700106227871....

Between Apr 2010 and Jun 2010, your credit limit/high balance was \$900

Balance history
Jun 2010: \$695 Apr 2010: \$0

0140161494

L-719-05677-0407000





Record of requests for your credit history

We make your credit history available to your current and prospective creditors and employers as allowed by law. Experian may list these inquiries for up to two years so that you will have a record of the companies that accessed your credit information.

Inquiries shared with others

The section below lists all of the companies that have reviewed your credit report as a result of an action you took, such as applying for credit or financing or as a result of a collection. The inquiries in this section are shared with companies that view your credit history.

MACYS/DSNB	Date	Reason
9111 DUKE BLVD MASON OH 45040 <i>No phone number available</i>	Jun 23, 2010	Permissible purpose. This inquiry is scheduled to continue on record until Jul 2012.

Address identification number: 66351525		
RESIDENTCHECK.COM	Date	Reason
4230 LBJ FMY STE 407 DALLAS TX 75244 <i>No phone number available</i>	Aug 19, 2009	Residential rental on behalf of DUNWOODY STATION. This inquiry is scheduled to continue on record until Sep 2011.
Address identification number: 65998788		

Inquiries shared only with you

You may not have initiated the following inquiries, so you may not recognize each source. We report these requests to you only as a record of activities, and we do not include any of these requests on credit reports to others.

We offer credit information about you to those with a permissible purpose, for example to:

- other creditors who want to offer you preapproved credit;
- an employer who wishes to extend an offer of employment;
- a potential investor in assessing the risk of a current obligation;
- Experian Consumer Assistance to process a report for you;
- your current creditors to monitor your accounts (date listed may reflect only the most recent request);
- a static copy of your credit report provided to a subsequent user necessary to complete your mortgage loan application.

These inquiries do not affect your credit score.

LEXISNEXIS/INS/P&C	Date
1000 ALDERMAN DR ALPHARETTA GA 30005 <i>No phone number available</i>	Jul 14, 2010
<i>On behalf of TRAVELERS for insurance underwriting</i>	
CIC/EXPERIAN CREDIT RPT	Date
PO BOX 19729 IRVINE CA 92623 <i>No phone number available</i>	Apr 20, 2010
EXPERIAN	Date
PO BOX 9600 ALLEN TX 75013 <i>No phone number available</i>	Apr 20, 2010
CITIFINANCIAL	Date
300 SAINT PAUL PL BALTIMORE MD 21202 <i>No phone number available</i>	Mar 2, 2010
HSBC NV CARD SERVICES	Date
12447 SW 69TH AVE TIGARD OR 97223 <i>No phone number available</i>	Dec 21, 2009; Sep 3, 2009
HSBC NV CARD SERVICES	Date
<i>No phone number available</i>	Sep 3, 2009



Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013
Page 9 of 14

Personal information

The following information is reported to us **by you, your creditors and/or other sources**. Each source may report your personal information differently, which may result in variations of your name, address, Social Security number, etc. As part of our fraud protection efforts, a notice with additional information may appear.

Names

JAMES F DINWIDDIE Jr
Name identification number: 30185
JAMES F DINWIDDIE
Name identification number: 18139
JAMES DINWIDDIE
Name identification number: 5190
JAMES DINWIDDIE Jr
Name identification number: 21405
JAMES F DINWIDDIE Jr
Name identification number: 11188

Addresses

These addresses are listed in no particular order and may include previous addresses where you received mail. The Address identification number is how our system identifies the address and identifies which creditor, court or potential creditor reported the address to us. The geographical code shown with each address identifies the state, county, census tract, block group and Metropolitan Statistical Area associated with each address. These listings do not affect your credit score.

	Type of address	Geographical code
1838 MARSH TRAIL, NE CIR ATLANTA GA 30328-5763 Address identification number 0066351525	Single family	0-1010980-121-0520
8525 ARJONS DR STET SAN DIEGO CA 92126-4384 Address identification number 0182414986	Multifamily	0-835010-73-7320
348 E PACES FERRY NE RD APTB4 ATLANTA GA 30305-2325 Address identification number 0207601249	Apartment complex	0-960040-121-0520

WFCB/VENUE	Date
4590 E BROAD ST COLUMBUS OH 43213 No phone number available	Jul 23, 2009; Jan 29, 2009
CAP ONE PO BOX 30281 SALT LAKE CITY UT 84130 No phone number available	Jun 1, 2009
WFCB/VENUE 4590 E BROAD ST COLUMBUS OH 43213 No phone number available	Jan 29, 2009
EXPERIAN PO BOX 2002 ALLEN TX 75013 No phone number available	Aug 21, 2008; May 19, 2008; Feb 10, 2008; Jan 23, 2008; Jun 30, 2006; May 26, 2006
EXPERIAN 701 EXPERIAN PKWY ALLEN TX 75013 No phone number available	Nov 15, 2007
EXPERIAN PO BOX 2002 ALLEN TX 75013 No phone number available	May 26, 2006

EXHIBIT 3 - 40

0140161494

L-719-05677-0507000





Personal information continued

	Type of address	Geographical code
405 S DALE MABRY HWY STE348 TAMPA FL 33609-2820 Address identification number 0516341049	Single family	0-580010-57-0520
405 S DALE MABRY HI WAY UNIT 348 TAMPA FL 33609- Address identification number 0664199246	Apartment complex	0-00-0-8280
5131 PEACHTREE RD ATLANTA GA 30341-2715 Address identification number 0582367165	Single family	0-2120820-89-
1804 GARNET AVE #479 SAN DIEGO CA 92109-3352 Address identification number 0617014918	Single family	0-790320-73-0520
7249 GENNAKER DR TAMPA FL 33607-5896 Address identification number 0290200087	Single family	0-1170830-57-0520
348 E PACES FERRY NE RD APTA ATLANTA GA 30305-2384 Address identification number 0210642848	Apartment complex	0-960040-121-7320
408 E PACES FERRY NE RD APTB4 ATLANTA GA 30305-3307 Address identification number 0478768780	Single family	0-960050-121-8280
707 DELLE CHASE CIR TAMPA FL 33634- Address identification number 0368493636	Single family	0-00-0-0520
400 HARBOUR PLACE DR APT1455 TAMPA FL 33602-6723 Address identification number 0391326065	Apartment complex	0-510210-57-0520
348 E PACES FERRY NE RD ATLANTA GA 30305-2384 Address identification number 0065998788	Multifamily	0-960040-121-8280

Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013
Page 10 of 14

	Type of address	Geographical code
500 S HIMES AVE TAMPA FL 33609-3973 Address identification number 0075365543	Multifamily	0-570040-57-0520
405 S DALE MABRY HWY TAMPA FL 33609-2820 Address identification number 0075362122	Single family	0-580010-57-
1804 GARNET AVE SAN DIEGO CA 92109-3352 Address identification number 0250563180	Single family	0-790320-73-8280

Social Security number variations

As a security precaution, we did not list the Social Security number that you provided when you contacted us. The numbers below are variations that have been reported to us. Only the last four digits of each reported variation are displayed. Numbers that appear here vary from the number you used to generate this report. Actual differences in the numbers may be part of the displayed portion or part of the hidden portion.

None

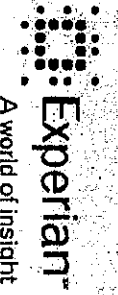
Date of birth
Jul 13, 1974

Telephone numbers
619 750 7333
770 952 8549
813 418 9700

Employers
TAMPA WHOLESALE DIRECT
RECREATIONAL DIRECT WAR
GOVERNORS CLUB 202 HALF ADAMS ST TALLAHASSEE FL 32304-

Notices
This address has pertained to a business: 8525 ARJONS DR STE T SAN DIEGO CA 92126
FOOD PRODUCTS MANUFACTURER: 8525 ARJONS DR STE T, SAN DIEGO, CA, 92126





---End of Report---

If you disagree with information in your report you may dispute it at:
www.experian.com/disputes

You may also visit www.experian.com to view your report again.

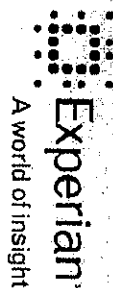
Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013

Page 11 of 14

0140161494 L-719-05677-0607000





Dispute form

For the fastest and easiest way to dispute information, visit:
www.experian.com/disputes

You may also mail this form to: **Experian, P.O. Box 9701, Allen, TX 75013**
 Or, call us for assistance at 1 800 509 8495

Use this form for any disputes you wish to submit by mail.

Complete all of the following information and submit by mail, within 90 days from the report date listed above. Once we receive your dispute, it may take up to 30 days (or up to 45 days for an investigation of information in an annual free credit report) to complete our investigation with the source of the disputed information. We will then notify you of the results. You may make copies of this form to submit additional disputes or use a separate piece of paper.

Remember, most accurate negative information will remain a part of your credit history for up to seven years and bankruptcies and unpaid tax liens for up to 10 years. Experian is regulated by federal law and we cannot remove information that has been verified as accurate from your credit report.

What's your credit score? Find out by ordering your VantageScore® for only \$7.95.

- ☐ Send my VantageScore® (Score will include investigation results of any disputes submitted on this form. Make check or money order payable to Experian.)
- ☐ Request overnight delivery via FedEx for an additional \$20 to receive your score report before investigation is completed.

Intentionally making any false statements could be punishable by law.

Your current identification information (correct any incorrect information)
Fill in your Social Security number: _____
(We cannot honor your request without your Social Security number.)
Current Mailing Address: 1838 MARSH TRAIL CIR NE ATLANTA GA 30328-5763
Year of birth: _____
Enter your email address to be notified when your results are ready: _____

Is any of the information below incorrect on your report?

- ☐ Spouse's name ☐ Telephone number - Which one is incorrect? _____
- ☐ Employer - Which one is incorrect? _____
- ☐ Date of birth - Fill in your correct date of birth: ____ / ____ / ____
- ☐ Address - Which one is incorrect? _____

Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

First dispute

Company name: _____

Your partial account number: _____

I believe this item is incorrect because **(Choose only one):**

- ☐ Payment never late ☐ Account closed ☐ Paid in full - On what date? ____ / ____ / ____
- ☐ Account included in bankruptcy - Chapter: ____ Filing date: ____ / ____ / ____
- ☐ Not my account - Who does it belong to? _____
- ☐ Other - Must explain: _____

Second dispute

Company name: _____

Your partial account number: _____

I believe this item is incorrect because **(Choose only one):**

- ☐ Payment never late ☐ Account closed ☐ Paid in full - On what date? ____ / ____ / ____
- ☐ Account included in bankruptcy - Chapter: ____ Filing date: ____ / ____ / ____
- ☐ Not my account - Who does it belong to? _____
- ☐ Other - Must explain: _____

Third dispute

Company name: _____

Your partial account number: _____

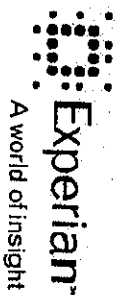
I believe this item is incorrect because **(Choose only one):**

- ☐ Payment never late ☐ Account closed ☐ Paid in full - On what date? ____ / ____ / ____
- ☐ Account included in bankruptcy - Chapter: ____ Filing date: ____ / ____ / ____
- ☐ Not my account - Who does it belong to? _____
- ☐ Other - Must explain: _____

0140161494

L-719-05677-0607000





Georgia Consumers Have the Right to Obtain a Security Freeze

You have a right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. A security freeze must be requested in writing by certified mail or by electronic means as provided by a consumer reporting agency. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your applications for credit. You should plan ahead and lift a freeze in advance of actually applying for new credit. When you place a security freeze on your credit report, you will be provided a personal identification number or password to use if you choose to remove the freeze on your credit report or authorize the release of your credit report for a period of time after the freeze is in place.

To provide that authorization you must contact the consumer reporting agency and provide all of the following:

- (1) The personal identification number or password.
- (2) Proper identification to verify your identity.
- (3) The proper information regarding the period of time for which the report shall be available.

A consumer reporting agency must authorize the release of your credit report no later than fifteen (15) minutes after receiving the above information if the request is by electronic means or by telephone, or no later than three business days when a written request is submitted.

A security freeze does not apply to a person or entity, or its affiliates, or collection agencies acting on behalf of the person or entity, with which you have an existing account, that requests information in your credit report for the purposes of reviewing or collecting the account. Reviewing the account includes activities related to account maintenance. You have a right to bring civil action against anyone, including a consumer reporting agency, who improperly obtains access to a file, knowingly or willfully misuses file data, or fails to correct inaccurate file data. Unless you are a victim

Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013

Page 13 of 14

of identity theft with a police report or other official document acceptable to a consumer reporting agency to verify the crimes, or you are 65 or older, a consumer reporting agency has the right to charge you a fee of no more than \$3.00 to place a freeze on your credit report.





Prepared for
JAMES FREDRICK DINWIDDIE
Report number
0132-7732-92

Report date
July 20, 2010
www.experian.com/disputes
PO BOX 9701, Allen, TX 75013
Page 14 of 14

THIS PAGE INTENTIONALLY LEFT BLANK

0140161494 L-719-05677-0707000



Exhibit 4

Local Form 88B (07/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises

UNITED STATES DISTRICT COURT

for the

Northern District of Georgia

James F. Dinwiddie, Jr.

Plaintiff

v.

LexisNexis Risk Solutions, Inc.; DBA Choicepoint, Inc.

Defendant

Civil Action No.

1:10-cv-03516-RLV-ECS

(If the action is pending in another district, state where:

District of)

This subpoena is invalid, and imposes no duty on the person served to appear, if it was not served together with the fees for one day's attendance and mileage. FURTHER, this subpoena imposes no duty on anyone to produce documents or things at his or her own expense.

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES

To: Travelers Insurance, Inc.

Registered Agent; CT Corporation; 44n: Dale Morris

1201 Peachtree St. NE, Atlanta, GA, 30361

☒ **Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material: See Attachment A ⇒ Request to produce all documents and information on file pertaining to plaintiff, received from named Defendants Reed Elsevier, Inc.; DBA LexisNexis Risk Solutions, Inc.; DBA Account, Inc.; DBA Choicepoint, Inc.

Place: James Dinwiddie, Jr.
1838 Marsh Trail Circle
Atlanta, GA 30328

Date and Time:

ASAP - no later than 1/5/11

☐ **Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date:

JAMES N. HATTEN

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) James F. Dinwiddie, Jr.

United States District Court
 2211 United States Court
 75 Spring Street, SW
 Atlanta, Georgia 30303-3361

, who issues or requests this subpoena, are:

1838 Marsh Trail Circle
 Atlanta, GA 30328

email ⇒ jayd124@hotmail.com
 phone ⇒ 404-952-8549

EXHIBIT 4